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LAS POSITAS REVIEW REPORT

Approved by
ABAG EXECUTIVE BOARD

April 17, 1975

City planning New towns
" Las Positas
" Livermore
" area

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I. LAS POSITAS REVIEW REPORT

EXECUTIVE SUMMARY

GENERAL BACKGROUND

At the request of the City of Livermore, and acting under procedures for examining development proposals of potential regional significance, a Hearing Board of the Regional Planning Committee conducted a preliminary review of the proposed Las Positas new community north of Livermore in Alameda County. The Hearing Board recommended to the Executive Board (which ratified the recommendation) that a full review of the proposal be undertaken. On January 8, 1975, RPC appointed a five-member Task Force to supervise the staff in developing a draft report and recommendations on the Las Positas proposal.

In the attached report, the Task Force presents its findings, based on extensive public discussion and information provided by the developer, local jurisdictions and citizens.

On April 2 the Regional Planning Committee accepted the Detailed Review Report and, by two separate 10-3 votes, recommended to the Executive Board that the Task Force's suggested summary findings, recommendations, and policy resolution on the Las Positas proposal be adopted. On April 17, the ABAG Executive Board approved a revised Resolution (Section II), Findings and Recommendations (Section III and IV), and accepted the detailed Review Report (Section V).

ABAG's approved findings and recommendations will be submitted to every agency with jurisdiction over the Las Positas project. In addition, ABAG will include its findings in reviewing any project or plan related to the proposed development. The Resolution commits ABAG to review the Developer's Specific Plan when completed.

MAJOR FINDINGS

1. The proposed Las Positas new community in the Livermore-Amador Valley is premature and substantially conflicts with regional policies.
2. Some of the problems identified with Las Positas are not unique to that proposal. Significant new development anywhere in the Valley beyond that already committed by the existing cities should be reviewed according to the same criteria used in reviewing Las Positas.
3. There are other places in the Bay Area with existing and underutilized capacity, with a need for better housing and more jobs, and without the unique serious environmental problems of the Valley. Development in such areas at this time could potentially support regional policies.
4. Construction of this project or similar projects in the Valley should be started only when specific conditions for environmental quality, balanced urban development and cooperative government action have been attained.

MAJOR CONFLICTS WITH REGIONAL POLICIES

The major conflicts of the Las Positas proposal with regional policies are identified in the report. As described in the report, the proposal would:

- Aggravate air quality problems in an area where air quality poses a recognized health hazard.
- Unless a high level of wastewater treatment is provided, threaten the quality of the Livermore-Amador Valley's ground waters and those in the lower Alameda Creek area used to serve Fremont, Newark and Union City.
- Require the creation of a new political or taxing body.
- Weaken the capability of existing communities to efficiently provide public services.
- Provide insufficient employment opportunities.
- Contribute to increased dependence on long home-to-work travel.
- Restrict housing choice for low- and moderate-income residents.
- Require the development of new public projects such as schools and health services facilities, duplicating unused capacity available in the older urbanized area of the region.

RECOMMENDATIONS: TWO ILLUSTRATIONS

A wide variety of actions by the public and private sectors could alter the conditions responsible for conflicts with regional policies in the Las Positas proposal and other growth-inducing actions in the Valley. Two of the report's many examples are given below:

1. Some pressing regional issues in the Livermore-Amador Valley are products of both public and private actions. Public rules for development and established building and financing practices should be modified to make it easier to rebuild and fill in existing cities rather than convert vacant land at the fringe of cities to urban uses.
2. There exists inadequate coordination of planning among all the government agencies serving the Valley. One vital step in changing the direction of current conditions would be for the Valley's public agencies to commit themselves to a coordinated program consistent with regional policies for making decisions on the location, timing and magnitude of major developments and the public services they require.

ASSOCIATION OF BAY AREA GOVERNMENTS

RESOLUTION NO. 3 - 75

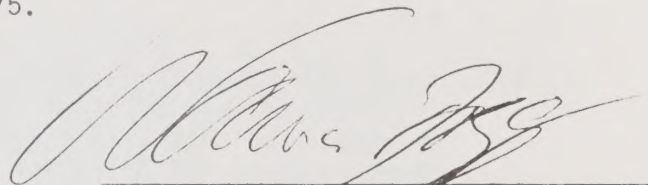
RESOLUTION CONCERNING LAS POSITAS PROPOSAL

- WHEREAS, The Association of Bay Area Governments has adopted procedures for review of projects of regional significance; and
- WHEREAS, In conformance with these procedures the City of Livermore has requested that ABAG review the Las Positas proposal; and
- WHEREAS, The ABAG Regional Planning Committee has examined all materials provided by the developer and available from other public agencies concerning the development and has conducted public discussions concerning the project on two occasions; and
- WHEREAS, The Regional Planning Committee has concluded that the serious problems of the Livermore-Amador Valley, which have been caused in part by regional, State, and Federal policies and actions, would be made much more difficult by the premature development proposed for the Las Positas area, and that such development or similar developments in the Valley would constitute serious conflict with regional policies as identified in the attached report; and
- WHEREAS, There are a number of areas in the region well served with facilities and now experiencing excess capacity where similar development of a similar scope may not be premature and in fact may be supportive of regional policies; and
- WHEREAS, ABAG, in its role as the Metropolitan Clearinghouse for Federal Programs under A-95 provisions of the Federal Office of Management and Budget would be called upon to comment if applications were made for Federal grants relating to such a project; and
- WHEREAS, The Alameda County Board of Supervisors has approved the General Plan amendment for the Las Positas area and established a number of conditions to be fulfilled before a Specific Plan for the area can be accepted; and
- WHEREAS, ABAG is supportive of the Alameda County special plan requirements; and
- WHEREAS, Numerous other public agencies may be called upon to take actions bearing on the Las Positas proposal or other projects which would induce significant growth in the Livermore-Amador Valley;
- NOW, THEREFORE BE IT RESOLVED THAT the Executive Board finds that the Las Positas project and other action which would result in substantial increase in growth in the Livermore-Amador Valley would be in serious conflict with regional policies so long as conditions leading to such conflicts have not been substantially improved. ABAG urges the Alameda County Board of Supervisors and all public

bodies having regulatory or program responsibilities affecting development in the Livermore-Amador Valley to:

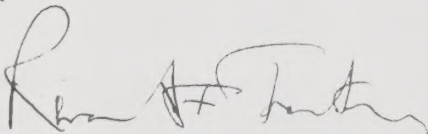
- A. Take into account the present position of ABAG regarding the Las Positas proposal and other similar proposals which would induce significant growth to the Livermore-Amador Valley and at the same time recognize that the policy may be reexamined when the conditions outlined in the attached policy statement have been substantially fulfilled.
- B. Cooperate in assisting all public and private organizations with responsibilities and interests in the Valley in the preparation of a coordinated plan and program for cooperative public actions to establish conditions which fulfill regional policies.
- C. Urge the Alameda County Board of Supervisors to request and be granted another review by ABAG when the developer's Specific Plan is completed as to its progress toward the conditions for conformance with the Regional Plan.

PASSED AND ADOPTED by the Executive Board of the Association of Bay Area Governments this 17th day of April, 1975.



Warren N. Boggess, President of the
Association of Bay Area Governments

Attest:



Revan A. F. Tranter, Secretary-Treasurer of
the Association of Bay Area Governments

III. SUMMARY FINDINGS CONCERNING THE PROPOSED LAS POSITAS DEVELOPMENT

I. Overall Findings

- A. The Livermore-Amador Valley has a number of very serious developmental problems which conflict with the objectives of a City-Centered Region including (1) substantial imbalance between jobs and residences which places added pressure on the existing air quality problems, which are the most severe in the Bay Area, (2) continuing difficulty in providing adequate levels of urban facilities and services to existing residents as evidenced by problems of water quality, education, and health services; (3) added costs of housing and serving population in the Valley making achievement of income balance within the communities difficult even in light of some prospective Federal assistance for low- and moderate-income housing, (4) a number of public agencies in the valley, all of which provide different public services to overlapping portions of the population without substantial coordination of programs. All of these conditions mandate that substantial growth in the Valley, beyond commitments already made by existing cities, must be viewed as premature and in serious conflict with regional policies.
- B. The specific proposed development would add massive amounts of housing and population which would aggravate the already serious problems of the Valley. Furthermore, the new development is proposed to take place outside the sphere of influence of existing cities and in conflict with the policies of a number of regional and State agencies charged with provision of facilities and services requisite to new development. No provision has yet been made to ensure adequate services to the proposed development in a cooperative way which recognizes the interrelated nature of all development in the Valley.
- C. The Las Positas development proposed is premature and would cause serious conflict with regional policies; however, there are a number of places in the Bay Area which have excess capacity where development at this time could potentially support regional policies by the provision of housing and jobs in areas with well established governmental services and facilities near population centers in need of better housing and more jobs, and without the unique serious environmental problems of the Valley.
- D. No substantial evidence has been provided to the Association that the serious and continuing problems in the Valley are going to be solved in the foreseeable future through actions of either the developer or by public agencies serving the Valley.

II. Based on a review of available information about the project and the area in which it is proposed the Regional Planning Committee finds that the proposal as presently set forth would substantially conflict with ABAG's adopted policies with respect to the following critical areas:

Conflicts primarily relating to Environmental considerations:

1. The proposed development would exacerbate air quality problems in an area where air quality poses a recognized health hazard.
2. In the absence of tertiary wastewater treatment (including salt removal), the proposed development would threaten the quality of the Livermore-Amador Valley's ground waters and ground waters in the lower Alameda Creek (Niles Cone) area which are utilized for domestic supply in Fremont, Newark, and Union City.
3. Without costly engineering measures and design constraints, geologic characteristics in the area of the proposed development would pose a potential hazard to the safety and well-being of future residents.

Conflicts primarily relating to Urbanization considerations:

4. By requiring the development of new public facilities, especially schools and health service facilities, which would duplicate unused capacity available in the older urbanized areas of the region, the proposed development would incur unnecessary economic and environmental costs.
5. The proposed development would weaken the capability of existing communities to provide efficiently public services thereby imposing an inequitable fiscal burden on their residents.
6. Since market characteristics in the area of the proposed development are not at this time conducive to attracting sufficient employment opportunities, there would be increased regional dependency on long job-residence commuting.
7. Housing market conditions in the area of the proposed development and the relatively low residential density projected will restrict housing choices for low and moderate income persons.
8. Were significant employment opportunities for the economically disadvantaged to be provided by the proposed development, the absence of a commitment by either the public or private sectors to ensure a BART extension to the area would result in diminished access from areas of recurring high unemployment.

Conflicts primarily relating to Growth Management in the Livermore-Amador Valley considerations:

9. The development as proposed would require creation of a new political or taxing entity in conflict with regional policies which seek to discourage scattered development not related to committed growth patterns, urban service areas or service capabilities.

- ✓ 10. The LAFCO decision to remove the Las Positas Valley from Livermore's planning area will impede the City's capability to formulate and implement an explicit growth policy consistent with regional objectives.
- ✓ 11. The lack of unified and coordinated planning among public agencies which have jurisdictional responsibility for the project conflicts with ABAG policies which mandate the coordination of planning to guide the timing, location, growth and limits of urban development.

Conflicts primarily relating to New Community considerations:

- ✓ 12. Because it does not broaden and diversify employment opportunities, because it makes no specific provisions for low- and moderate-income housing, because its financial feasibility has not been substantiated, and because as a result of the area's poor air quality, it would not provide a healthier environment, the proposed development is not consistent with ABAG's policies for the development of new communities.

IV. RECOMMENDATIONS

ASSOCIATION OF BAY AREA GOVERNMENTS POLICY STATEMENT: CONCERNING THE LAS POSITAS PROPOSAL AND OTHER SIMILAR MAJOR DEVELOPMENT PROPOSALS OR GROWTH INDUCING ACTIONS IN THE LIVERMORE-AMADOR VALLEY.

A number of serious regional problems exist in the Livermore-Amador Valley, many of which have resulted from policies and actions of Federal, State and regional bodies beyond the control of Valley residents and governments. The serious nature of valleywide problems combined with problems of the Las Positas proposal make the development premature and in serious conflict with regional policies. Other similar proposals or growth inducing actions would likewise potentially be in serious conflict with regional policies until actions can be taken to establish better conditions in the Valley itself. The proposal is premature not only because of conditions in the Valley but also because it calls for adding substantial growth in that uniquely troubled area while other portions of the Bay Area, some nearby, contain excess urban service capacity and may be well suited to development. Development in such areas would be supportive of regional policies. In fact, part of the conflict associated with the Las Positas proposal typifies one aspect of the land development process in the Bay Area-- pressure to encourage leapfrog conversion of land to urban uses at the expense of the effort to rebuild and strengthen existing cities and urban resources. The Association will take the following actions:

1. The Association will notify other public bodies of these findings in review of any projects or plans relating to the proposed development.
2. The Association notes that any actions which would encourage a substantial population growth in the Valley, before the serious problems are solved, potentially would be in serious conflict with regional policies.
3. The Association may, upon request from the developer or a member unit of government, reexamine this policy to determine if conditions have changed or firm commitments to change conditions, set forth below, give evidence that serious inconsistencies with regional policies have been removed. Requests for further Association review of this policy shall specify the changed conditions and/or commitments which appear to warrant such reexamination.

Examples of the changes in existing conditions that would need to occur in order to eliminate the conflicts and inconsistencies with regional policies:

1. Evidence that air and water quality standards required by Federal and State law can be achieved and maintained.
2. Reduction in commuting from the Valley to other parts of the region which would be a major step toward establishing air and water quality standards, and a better balance of jobs and housing in the Valley.
3. A range of employment opportunities appropriate to the skills and income characteristics of economically disadvantaged residents on the Region to ensure existence of balanced population.
4. Increased opportunities for low-and moderate-income persons to live and work in the Valley.
5. A coordinated program of planning and governmental organization to meet the problems of the Valley consistent with regional policies which will be used as the basis for planning and governmental decisions by all public agencies in the Valley.
6. Governmental organization and consolidation in the delivery of public services leading to fiscal balance and service equity.

The policy findings and recommendations constitute the result of a review to identify possible conflicts with regional policies, as distinct from a plan for the Valley which would demonstrate how the necessary conditions could be established. However, the following principles for review of projects and suggestions for actions by other public and private bodies are noted as illustrations of the nature of actions required.

Principles for Review of Additional Proposals for Development in Livermore-Amador Valley:

1. Further growth in the Valley is expected. It must, however, be undertaken only in the context of a better job-residence balance, more balanced communities, and a firm and demonstrable commitment to solution of the pressing environmental problems of that area.
 - a. First priority for growth should be those areas where cities have made existing commitments.
 - b. Second priority should be in areas where service capacity and adequate governmental mechanisms are in place to ensure balanced and managed development in accordance with consistent Valley-wide plans and policies.
2. Decision makers must recognize that, in this circumstance, regional questions of community balance, jobs related to population, and the pressing environmental issues require cooperative rather than independent action in order that regional policy objectives may be fulfilled.

Suggested Actions

Based on the findings of the ABAG review, the Regional Planning Committee has determined that this project and other actions which would encourage a substantial increase in the Valley's population could be found inconsistent with adopted regional policies until such time that the conditions which are responsible for the conflicts have altered. It is apparent that many of these conditions are a product of factors which are beyond the control of local or even regional jurisdictions. There are, nevertheless, a variety of actions which could be taken by all segments of both the public and private sectors to alter the present situation. Some of the steps which could be taken are:

Public Actions

Federal

1. Consistent with the purposes of the Housing and Community Development Act of 1974, which supports the development of viable urban communities as well as a more rational utilization of land and other natural resources, the Federal government should take steps to ensure that new development supported by Federal funds shall not be undertaken at the expense of revitalization and redevelopment of existing urban areas and ensuring that adequate financial assistance is available to support activities in existing urban areas.
2. The Federal government should expand its efforts in the development of pollution-minimizing forms and developing pollution-free forms of transportation.

State

3. Through the establishment of a State Housing Finance Agency, support should be provided to assist in the maintenance and improvement of existing low- and moderate-income housing as well as the provision of additional lower cost units in communities which can provide a range of facilities, services and employment opportunities.
4. In order to maintain the viability of existing urban areas and reduce pressures for ever outward development:
 - a. create a set of consistent State policies regarding location of major urban centers in California and area resources management and protection which can operate in concert with strengthened local and regional policies and programs.
 - b. recognize that the State has the responsibility to act if prime land is to be retained and farming be maintained as an alternative way of life close to metropolitan areas.
 - c. State policies on property taxation should be altered to strengthen the ability of homeowners to maintain and upgrade their properties, especially in the older areas while, at the same time, stimulate economic redevelopment and revitalization of those areas.

Regional

5. Agree to utilize ABAG regional policies and such plans and programs for coordinated development of the Livermore-Amador Valley as may be produced through cooperative action by Valley public agencies. The regional agencies should be prepared to support and participate in preparation of such a plan and cooperative governmental structure.

Local

6. As a step toward achieving consistency with regional policies, a program to coordinate planning and governmental organization activities in the Valley should be undertaken by the County and local jurisdictions. This effort should:
- a. Reach agreement upon a single range of growth projections to be utilized by all jurisdictions and special districts to guide planning and other governmental decisions regarding the location, timing and magnitude of development as well as the staging and sizing of facilities to service such planned growth;
 - b. Recognize the need for cities to honor existing service commitments;
 - c. Prepare specific actions which can be taken to overcome the serious environmental problems in the Valley with particular attention to air quality;
 - d. Ensure that a balance of jobs, incomes, and population groups can be supported within the Valley with an adequate standard of facilities and services;
 - e. Outline a feasible economic development program with incentives to provide a job balance in the Valley which reflects the serious environmental problems, job skill mix supportive of a balanced population, and with specific controls against attracting jobs from areas of serious economic distress;
 - f. Clarify the point at which development of the Las Positas area would be appropriate and the standards of development needed to make such development supportive of overall Valley balance;
 - g. Establish a cooperative mechanism to support rebuilding and infilling of existing cities and away from continued conversion of land to urban uses beyond existing urban service areas.
7. Alameda County should expand its efforts in establishing ongoing mechanisms for the provision and retention of housing for low and moderate income persons.

8. The Alameda County Local Agency Formation Commission in conjunction with the Alameda County and other service providing entities should undertake in-depth cost/benefit analyses as an aid to sphere of influence determinations.
9. In order to guard against premature development, the cities of Livermore and Pleasanton should consider purchasing outstanding development options on appropriate properties in their outlying areas; including for Livermore, the site proposed for the Las Positas development, and reserving these sites by land-banking for use at a time in the future when conditions have changed sufficiently so that the problems identified in this report have been alleviated.

As an interim measure, the Alameda County Local Agency Formation Commission should place such areas in a holding zone to be retained until such time that the conditions identified herein have been mitigated and development in those areas is warranted as an extension of existing growth.

Private Actions

10. The construction, development, and financial communities should reorient lending and marketing policies to support rebuilding and infill of existing cities and away from continued conversion of land to urban uses beyond existing urban service areas. By such statesmanlike actions many of the lengthy and mutually destructive confrontations between private sector investment plans and public policies can be reduced.
11. Major employers should assist in providing direct or indirect subsidies to meet the housing needs of their low- and moderate-income employees.
12. Agricultural landowners seeking property tax relief should consider including their lands within the protection afforded by the California Land Conservation (Williamson) Act.

V. DETAILED REVIEW REPORT

INTRODUCTION

On December 19, 1974, ABAG's Executive Committee directed the Regional Planning Committee to undertake a review of the proposed Las Positas New Town in Alameda County. The Executive Committee action followed a preliminary finding by an RPC-appointed Hearing Board that the proposal was of regional significance and potentially conflicted with adopted ABAG policies and objectives.

This report presents the findings and conclusions of the Regional Planning Committee based on research and analysis done by an appointed five-member RPC Task Force and ABAG staff. It provides the basis for the recommendation to be referred to the Executive Board for its approval on April 17. The report is based on testimony received by ABAG at public meetings held in Livermore on September 4, 1974 and at the Hotel Claremont on February 5 and March 12 of this year as well as on reports and written testimony from public agencies, organizations and individuals.

To facilitate the review, ABAG's analysis and this report were divided into ten functional areas:

1. Air Quality
2. Water Supply and Water Quality
3. Environmental Hazards
4. Land Resources
5. Population Growth
6. Fiscal/Human Service Impacts
7. Economic Development
8. Housing
9. Transportation
10. New Communities

With respect to each of the above areas, consideration has been given to:

1. Applicable ABAG policies;
2. Relevant factors regarding the project and the area in which it is proposed;
3. Potential consistencies and inconsistencies; and
4. Measures for alleviating or eliminating conflicts identified.

PROJECT DESCRIPTION AND STATUS

The proposal under review concerns the development of a new town in a 9,000 acre area located in a now-undeveloped and unincorporated portion of Alameda County bounded by the City of Livermore to the south and the Contra Costa line to the north. Development of the community would be staged over a 20-year period with an ultimate population range of 40,000 to 45,000 anticipated by 1996. The developed area would be utilized as follows:

<u>Usage</u>	<u>Acreage</u>
Residential (15,000 units)	2,700
Commercial	90
Industrial Park	290
Public Facilities, Services and Schools	228
Recreation, Parks and Greenbelts	760
Circulation	145
Total Developed Area	4,213 Acres

Acting on a recommendation from the County Planning Commission, the Alameda County Board of Supervisors on December 19, 1974 approved amendments to the County's General Plan involving redesignation of a 4,275-acre area north of the City of Livermore from Agriculture, Low and Suburban Residential to Residential, Commercial and Industrial classifications. The Planning Commission recommendation indicated that a comparable amount of land elsewhere in the unincorporated portions of the Valley shall be removed from residential classifications. No specific areas were suggested, however, and to date no action has been taken in this regard. The Board of Supervisors at the same time adopted a resolution listing five policy requirements to be included in any Specific Plan developed for the Las Positas area. These relate to the inclusion of lower-cost housing, the provision of public services and the mitigation of air and water quality problems.

AIR QUALITY IMPACT

I. ABAG Policies

The region and its urban areas should be planned and managed to minimize pollution causing processes.

Urban growth should be planned in such a way as to reduce the need for long distance commuting.

Protect the region's residents by reducing their exposure to hazardous environmental conditions.

(Regional Plan 1970-1990)

II. Relation of Project to Regional Policies

There are four aspects of the Las Positas project which are of particular significance in evaluating its relationship to air quality issues.

A. The project is proposed in the Livermore-Amador Valley, a locale in which the inherent topographical and meteorological characteristics and conditions are highly conducive to the formation of severe air pollutant concentrations.

B. Motor vehicles have been and for some time will probably continue to be the largest single source of pollutant emissions in the Valley. Although some increase in the number of automobiles in the Valley might be offset by expected lower vehicular emissions in the future, it is still predicted that certain air quality standards will be violated. Consequently, the increased automobile travel due to the Las Positas project or any other growth in the Valley is especially significant.

C. At present the largest component of vehicle miles travelled in the Valley is devoted to trips to, from and through the Valley rather than within it. Although the Las Positas proposal promises to bring jobs to the Valley--and hopefully reverse the current commuting trend--there is no clear evidence that it would do so.

D. Development of the Las Positas New Town in the Livermore Valley would expose its residents to the health hazards of high pollutant concentrations. Some of the health effects resulting from high oxidant levels, the primary problem in the Valley, include eye irritation, aggravation and increased susceptibility to respiratory irritation and increased susceptibility to respiratory disease and fetal damage.

Pollution monitoring conducted in the Valley since 1967 by the Bay Area Air Pollution Control District shows that oxidant levels have continued to exceed the national standard despite a decline in both emissions and oxidant levels throughout the Bay Area. Although on certain days since 1967 both San Jose and San Leandro have recorded higher concentration levels, both the number of days the standard has been exceeded and the average oxidant levels are higher in Livermore than any other part of the Bay Area. In 1973, the Federal standard of .08 ppm (parts per million) was exceeded 73 days in Livermore compared with 55 in San Jose and 12 in Oakland. This standard has been violated in Livermore from 35-154 days per year between 1969 and 1974.⁶ This situation is caused by summer meteorological conditions which favor buildup of pollutants (inversions and light winds), and an abundance of sunlight to catalyze the formation of photochemical oxidants. There are several sets of predictions for the number of days the Federal oxidant standard will be exceeded in 1990 in the Livermore Valley. The CALTRANS Environmental Impact Statement for the Interstate 580 expansion² predicts 2-4 days for a population of 180,000 to 220,000. An analysis by A. D. Little, Inc., for the Valley Community Services District³ indicates that this estimate may be low because it was based on a year with unusually favorable meteorological conditions, and it is "predicated upon successful implementation of emission control technology which may not take place as scheduled." (p. 58) The MTC staff report on Rt. 580 expansion⁴ predicts (for a population of 180,000) a range of six to thirty days (depending primarily on transportation alternatives) in which the standard will be violated. The EIS for Las Positas prepared by Wilsey and Ham⁵ does not attempt to predict this number and does not present data which facilitate the computation, as reactive hydrocarbons are not indicated separately.

Depending on the stringency and enforcement of automobile emission regulations and on the extent to which the Valley's problem can be attributed to the transportation of reactive pollutants from other parts of the region, some improvement will probably occur during the next 10 to 15 years. The BAAPCD warns, however, that the anticipated improvement in the region's conditions due to emission controls will probably be temporary. After 1980, the District staff says, the decline in emissions will be counteracted by an actual increase in the number of automobiles.⁷ Even if this is not true for the region as a whole, a substantial increase in the Valley's population and number of automobiles could also negate the effect of emission controls. Therefore, even if the spatial configuration of the Las Positas development might encourage less internal automobile use than the average suburban subdivision, the project nonetheless will produce a substantial amount of the projected Valley emissions.⁸

The developer has indicated that air pollution mitigation would be a primary determinant in developing Las Positas. "While the New Town cannot be expected to resolve basin-wide problems," one of the developer's reports notes, "... innovative land use and transportation planning offers real opportunities to alleviate locally-induced problems in terms of alternative sprawl development patterns." No commitments have been offered, however, which would indicate that air pollution mitigation would be a condition of development approval. Furthermore, unless simultaneous actions are taken to amend local plans to reduce the amount of land available for development in the Valley, Las Positas New Town would not be an alternative, but rather an addition to already projected Valley growth. Moreover, without

specific conditions at the time of approval, it is unlikely that the provision of sufficient employment to reduce automobile commuting would keep pace with residential development. As noted above, claims that 9,000 jobs would ultimately be provided have not been substantiated.

Extension of BART to the Livermore area is still unresolved. Without substantial automobile commuting, however, BART might not be considered warranted. In other words, the air pollution problem may well be significantly exacerbated before a decision on BART is even made. During the subsequent planning and construction period the situation would in all likelihood worsen. Once BART were built its effect on pollution reduction could be countered by the additional inducement provided to growth. Therefore, even though trip length might be reduced by producing additional local employment or extending BART to the Valley, the number of local automobile trips would not be affected unless local transit is provided. This factor become important because of the higher level of pollutants emitted from engines when first started up than when operating during a trip. Although the intra-community bus system proposed by the developer could provide an alternative, there is no indication how the system would be financed. Experience indicates, however, that minimum population levels and densities are required if such systems are to be economically viable. Failure to achieve the optimal levels for a variety of reasons, such as market factors or the availability of financing at acceptable rates, could require continued reliance on the automobile for an indefinite period. "While current conditions would dictate that the automobile must be considered a major determinant of circulation routes, the resulting system has considerable potential for multimodal use of right-of-way and adaptation to public transit utilization," states the developer's Proposed Amendment to the Alameda County General Plan. However, if financing is not available, it is questionable whether the impetus to develop that potential will be sufficient as long as specific provisions are not included to discourage automobile use.

To the degree that the circulation patterns of the integrated multimodal transportation system of the project might be expected to limit automobile use within the development, the design of the internal aspects of the proposal might be considered consistent with Regional plan policies which say communities must be planned to minimize pollution-causing processes. It does not follow, however, that the total proposal, when considered in the context of the nine-county region, would share this same compatibility with regional policies.

III. Findings/Recommendations

1. The project is proposed to be located in an area which is known to have the highest oxidant level in the entire Bay Region. Until the present and projected air quality situation is remedied, it would be questionable from a health standpoint to encourage substantial additional habitation in the Livermore Valley now or in the future.
2. Because the project is located far from existing employment centers, and because the proposed jobs in the locale will not likely keep pace with the rate of residential development (see

Economic Development section of this report) the project appears to be inconsistent both with ABAG's policy for guiding new growth near existing centers and for reducing the need for long-distance commuting by automobile.

In order to eliminate potential conflicts in regional policies, there would have to be evidence that air quality in the Livermore Valley with the addition of the Las Positas project would not violate current State and Federal Air Quality Standards. An example of an action by the developer to achieve this condition would be the provision of alternatives to the automobile in order to bring about a reduction in VMT as found necessary to achieve and maintain the standards of the Federal Clean Air Act.

WATER SUPPLY AND WATER QUALITY

I. ABAG Policies

Water supply, storage, distribution, treatment and disposal, as well as sewage collection and storm and flood management should be considered as interdependent functions. With this in mind, a water use and reuse cycle that integrates the conservation of air and land resources should be evolved.

The planning and management of urban development, open space, water supplies, etc. should be mutually reinforcing.

(Regional Plan 1970:1990)

II. Relation of Project to Regional Policies

Four water related issues have been identified in the Livermore-Amador Valley that are directly or indirectly impacted by the Las Positas Proposal.

A. Water Supply and Demand

Water supply for the Livermore-Amador Valley comes from both imported and local sources and is under the overall management of Zone 7 of the Alameda County Flood Control and Water Conservation District. Existing physical capabilities and contractual agreements determine the ability to meet local and future demands. Imported water comes from three sources: Mokelumne River (East Bay Municipal Utility District), Hetch-Hetchy Reservoir (San Francisco Water District) and South Bay Aqueduct (Zone 7); local water comes from numerous wells. Most of this water is distributed by four local agencies: California Water Service Company, City of Pleasanton Water Department, City of Livermore and Valley Community Services District (VCSD).

The total volume of water consumed in the Valley during fiscal 1973-74 was approximately 34,000 acre-feet, of which about 70% came from groundwater (local) sources. The safe annual yield of the groundwater basin has been estimated to be between 22,000 and 24,000 acre-feet, which means that the limit on groundwater consumption has already been reached. Imported water from the South Bay Aqueduct (SBA), Mokelumne River and Hetch-Hetchy Reservoir were 14,200, 1,500 and 500 acre-feet respectively. Of the import supply, 7,100 acre-feet (about 44%) were used for groundwater recharge. The allotment of State waters to Zone 7 will increase from 16,000 to 37,000 acre-feet from 1975 to 1990, with a maximum entitlement of 46,000 acre-feet by 1997.¹⁰ Assuming that 24,000 acre-feet can be withdrawn from groundwater, a total of 61,000 acre feet of "raw" water will be available in 1990.

✓ Demand for water will increase due to population growth and increases in consumption rates; the Alameda County Flood Control and Water Conservation District estimates that per capita consumption will increase from the current 160 gallons per day (gpd) to 180 gpd by 1990.¹¹

Peak day demand of water in the Valley for 1970 was about 23.4 mgd for a population of 77,655 and a consumption rate of 160 gpd per capita.¹² The Alameda County Planning Department has projected populations of 157,000 ("B" series) and a 192,000 ("A" series) for the Valley by 1990.¹³ Assuming a per capita consumption of 180 gpd, the 1990 peak day demand will be 53.1 and 62.6 mgd respectively. The projected treatment capacity of water supplies is expected to be 48.5 mgd by 1990.¹⁴ Therefore, demand will exceed supply by 4.6 mgd for the "B" series projection and 14.1 mgd for the "A" series projection.

Four basic conclusions have emerged from this brief analysis of water supply and demand in the Valley:

- ✓ 1. Future demand will rely increasingly on imported water since the pumping quota from groundwater has more or less reached the allowable limit.
- ✓ 2. The amount of "raw" water (imported and groundwater) is expected to be more than adequate in meeting the various levels of demand by 1990.
- ✓ 3. The water treatment capacity will not be able to meet the 1990 demands.
- ✓ 4. In order to accommodate future growth, expansion of existing distribution systems will be necessary, including new capital improvements that would have to be completed prior to water delivery to new customers.

B. Water Quality Issues

✓ The primary problem of water quality involves the possible degradation of the groundwater basin in the Livermore-Amador Valley and Niles Cone; the former serves both urban and agricultural water needs and the latter serves as a water supply source for urban water needs of the Fremont-Union City area. During dry months, discharge of partially treated wastewaters into Alameda Creek from municipal sewage treatment plants create a water quality problem for both groundwater systems.¹⁵ Major concerns are the level of total dissolved solids, nitrate and sodium loads, and potential buildup of stable organic pollutants, especially at the Niles Cone system. The degradation of Niles Cone groundwater would likely be exacerbated by increased development in the Valley. The Regional Water Quality Control Board (San Francisco Bay Region) is requiring that all discharges into Alameda Creek meet not only tertiary treatment standards but also undergo additional processing for removal of salts.¹⁶ Meeting such standards would alleviate the water quality problem but it would probably add substantially to treatment costs.

C. Wastewater Treatment and Reuse

Wastewater treatment in the Livermore-Amador Valley is served basically by three treatment plants owned and operated by the Cities of Livermore, and Pleasanton and by the Valley Community Services District. The current capacity (dry weather flow) of the three plants is 10.4 mgd. Livermore has reached about 97 percent of its 5 mgd capacity; VCSD has reached about 97% of its 4 mgd capacity; and Pleasanton 95% of its 1.4 mgd capacity.¹⁷ It is apparent that these facilities have to be expanded to accommodate expected growth in the existing communities, not to mention any new community. Presently, the City of Pleasanton is being extensively litigated on the question of providing sewage treatment capacity to meet allegedly outstanding commitments. It should be noted that Livermore-Amador Valley Water Management Agency's (LAVWMA) joint agreement limits its sewage treatment capacity to 13 mgd, and that the State has limited its eligible capacity to that necessary to serve a population of approximately 145,000 to 153,000 by the year 2000.¹⁸

The uses of treated wastewater are limited by the standards imposed by California State Department of Public Health and the Regional Water Quality Control Board. At present, treated wastewater is used for landscape and pasture irrigation, and groundwater recharge by percolation in stream beds. There is concern in the Livermore Valley, however, that the groundwater would be polluted unless the effluent met at least tertiary standards. In addition, there are indications that because of the area's characteristics, increased irrigation could create sedimentation and erosion problems.

D. Flood Hazards

The various creeks in the Livermore-Amador Valley carry considerable runoff during the high rainfall season which creates potential flood hazards in many areas. In the event of a 100-year flood, several localities within the proposed boundaries of Las Positas will be inundated, especially along Cayetano Creek (U.S.G.S. Water Resources Investigation 37-73).¹⁹ In addition, the development of Las Positas will most likely increase erosion, causing additional siltation downstream.

The precise boundary of the floodplain is not defined at present. Findings from the proposed urban study by the Corps of Engineers would provide such information.

III. Findings/Recommendations

Water Supply

Unless treatment capacity is significantly expanded, the supply of potable water for the Livermore-Amador Valley will not be able to meet the demand by 1990. The development of Las Positas would put a further strain on the treatment capability capacity. The policy of Zone 7 (adopted September 19, 1973) stated that the Zone will not furnish water to a new customer if such provision would jeopardize the quality of water the Zone has been providing existing customers.²⁰ Further, the Water Department of the City of Livermore requires that, as a condition of providing water service, an agreement be made permitting annexation of the served property to the City of Livermore.²¹ Extension of the Livermore Water Service Area to include proposed development in the northern portions of the Las Positas area would require review by the Alameda Local Agency Formation Commission and by the State Public Utilities Commission.

Water Quality

Proposal to discharge into Alameda Creek or Arroyo Las Positas waste treated by means other than tertiary treatment including salt removal is in conflict with Water Quality Management Plans that have been accepted by the Regional Water Quality Control Board. This problem can be circumvented if the wastewater undergoes tertiary treatment, including the removal of salts before discharge.

Wastewater Treatment

Under present conditions, it is doubtful whether the existing sewage agencies would be willing to accommodate the wastewater generated by the development of Las Positas. As a result, the developer may propose that an independent sewage agency would increase the fragmentation of governmental services and responsibilities. Such a move would be in direct conflict with the clean water policies of ABAG, BASSA, RWQCB, and State Water Resources Control Board which encourage integrated and coordinated planning and discourage the continued creation of local sewage agencies.

Wastewater Reuse

The principle of recycling treated wastewater for irrigation and ground water discharge is consistent with ABAG's water policies. However the constraints mentioned above suggest that this practice may be limited in the Valley.

Flood Hazards

Development in the floodplain would not be consistent with the objectives of Flood Disaster Protection Act of 1973.

A. The Change In Conditions Which Would Be Required In Order To Eliminate Potential Conflicts

Coordinated wastewater planning, with working agreements among wastewater agencies and multipurpose jurisdictions to accommodate the effluent that would be generated by the proposed development.

B. Steps Which Could Be Taken To Change Conditions

The developer must demonstrate that effluent from waste treatment facilities will meet regional water quality standards. (This means not only tertiary treatment, but additional -- and more costly -- processing to meet the salt mass emission rate limitation.)

ENVIRONMENTAL HAZARDS

I. ABAG Policies

The Regional Plan contains a number of policies pertaining to the avoidance of hazards intrinsic to the natural environment. These include:

1. Open Space for Public Safety: The development of lands in this category would present a reasonable probability of direct hazard to life and property.

(Regional Open Space Plan - Phase II)

2. All forms of urban development should be planned to minimize disturbance of the region's natural processes.
3. The form of urban development should be directed as much as possible by natural determinants.

(Regional Plan 1970:1990)

II. Relationship of Project to Regional Policies

The Las Positas New Town is proposed to be built on lands that have limitations for residential use due to the presence of a number of potential hazards to human safety.

The two most important potential problems on the site are the erosion potential and landslide susceptibility of the rocks of the Orinda Formation. These loose, poorly consolidated sedimentary rocks are found at or within 15 feet of the surface on all but 500 of the 4,273 acres where development is proposed.^{22,23} Residential development on these materials will increase the rate of erosion which occurs on the project site and may subject areas downstream from the project to excessive amounts of stream-borne sediments. Although no landslides were noted on the photointerpretation map of the area prepared by U.S.G.S.,²⁴ the development will increase the likelihood of landslides due to the increased presence of water. Many landslides are present in the same types of rocks in the now developed areas of Lafayette, Orinda, and Moraga where more rainfall occurs.²⁵ The clay-rich soils which develop on these rocks are also susceptible to a slow down-slope movement called "creep."

The other, more minor, problems on the site are related to faulting and earthquake groundshaking. Three major faults and their branches cross the project. None of these faults is designated as active by the State Geologist as part of the Alquist-Priolo Act map program or by the U.S.G.S.^{26,27} Their potential for damage therefore is slight. The only significant potential for damage connected with the faults would be related to the zone of weakness that the faults may have created in the rock. If such a zone exists, this zone would be

more susceptible to landsliding. The other seismic problem, groundshaking, could trigger a landslide. However, groundshaking is no more significant a problem in this area than in the remainder of the Bay Region.

The setbacks and building standards discussed by the proposed development adequately mitigate only the seismic-related hazards. The development, as proposed, does not appear to address the significant problems associated with the poorly consolidated rocks and clay-rich soils present in the area. Although it is possible to engineer a project in a manner which would reduce the site's inherent erosion and slope stability problems, this may lead to a substantial increase in project costs. These limitations may make this site particularly unsuitable for large scale development.

III. Findings/Recommendations

Without costly engineering measures and design constraints, geologic characteristics in the area of the proposed development would pose a potential hazard to the safety and well being of future residents.

LAND RESOURCES

I. ABAG Policies

The region should consider for preservation in open space lands which serve the following functions: managed resource production; natural and human resource preservation, human health, welfare and well-being, public safety, outdoor recreation, and city-forming purposes.

All forms of urban development should be planned to minimize disturbance of the region's natural resources.

The form of urban development should be dictated as much as possible by natural determinants.

The physical environment of the region should be pleasing and meaningful to the intellect.

(Regional Plan 1970:1990)

II. Relation of Project to Regional Policies

There are three land resource issues identified in the Las Positas project area.

A. Agriculture

Land use in the project area is now primarily agricultural with dry farmed field crops and grazing constituting the major activities. Although vineyards are located on the southern side of the City of Livermore, not far from the project area, the soils, climate and water availability on the Las Positas site share none of the characteristics of the grape-growing area. Some intensive crops could be grown in lands having soils of the Rincon-San Ysidro association, but this use would be dependent on the availability of adequate ground-water supplies. Other lands are highly susceptible to erosion, and would be unsuitable for crop production unless extreme engineering precautions are taken. (See Environmental Hazards section of this report.)

B. Wildlife

There do not appear to be many wildlife species unique to this district. A possible exception is the Alameda striped racer, a snake species included on the list of Rare and Endangered Wildlife maintained by the State Department of Fish and Game. The Wilsey and Ham EIR notes only the possibility that the racer may be found on the project site.²⁸

The developer should supply evidence that the Las Positas site is not the sole habitat of the striped racer, and that its conversion to urban uses would not otherwise impact on this species.

C. Scenic Resources and Regional Landscape Amenities

The project site is characterized by scattered old ranch houses, structures, wooden water tanks, barns, windmills, and fences. The rustic buildings have an indigenous appearance that visually complements the surrounding landscape of open land.

Although the North Livermore Area Plan Amendment EIR describes landscape values in terms of local and county-wide benefits, there are several reasons why these qualities of the Valley are significant at the regional level.

1. The land is clearly visible from parts of Route I-580, a major highway which not only connects the Bay Area with the Central Valley but which provides the shortest and hence most utilized link between the Region and all of Southern California. This Highway is designated a scenic highway by Alameda County.²⁹
2. Much of the regional travel to the Livermore Valley is for weekend recreational purposes, either related to the regional parks or to the three wineries in the area. Landscape qualities which might otherwise be considered unexceptional could, in the Livermore area, be an important component of an outdoor and rural experience which is of particular value because of its proximity to highly urbanized areas.

POPULATION GROWTH

I. ABAG Policies

- A. Each community will be encouraged and supported in its efforts to formulate an explicit growth policy. These local growth policies should be developed by each community in concert with county and related governmental units.

(General Assembly Resolution 10/11/73)

- B. Regional urban development should be directed to and fostered in communities within general growth corridors. Such development should be guided by coordinated local, regional, State and Federal policies concerned with urban and industrial growth and open space.

(Regional Plan 1970:1990)

- C. The region should begin to explore the subject of population increase beyond 1990 and how it can be accommodated. The possibility of continuing population growth should be reexamined as it relates to the City-centered concept.

(Regional Plan 1970:1990)

- D. ABAG's projections define a range of future growth for the purpose of planning and evaluation of regional-scale facilities and services and to assist in coordination of local planning activities.

(Regional Planning Committee 12/4/74)

- E. ABAG's Series 2 projections, although not a recommendation for a particular level or pattern for growth, can provide a basis for judging the consistency of local policies and conditions within a framework of regional growth policy alternatives.

(Regional Planning Committee 12/4/74)

II. Relationship of Project to Regional Policies

As shown in the following table, the wide divergence in growth projections for the Livermore Valley is indicative of the conflicts which exist among the planning policies of the various agencies involved in planning for the area. When evaluating the impact of a development anticipated to significantly contribute to population increases, variations in projections of the magnitude of those occurring in the Livermore Valley are particularly important because the different agencies issuing them are also responsible for a variety of decisions involving the staging of growth and the provision of public services required to accommodate that growth. While projections are not usually intended to have the same standing as plan policies, they often reflect policy assumptions. It is fair to say, therefore, that the differences occurring in this situation are likely to result primarily from policy conflicts.

Population Projections

1970 - 2000

Livermore Planning Area

	1970	1980	1990	2000
Alameda County 1966 General Plan				
Low	58,000	110,000	160,000	196,000
Medium	75,000	151,000	235,000	301,000
High	92,000	192,000	310,000	406,000
1972 Series	(77,650)			
Series A		132,000	192,000	---
Series B		120,000	157,000	---
ABAG Series 2				
Losouth		106,000	138,000	168,000
Gronorth		114,000	163,000	225,000
Grosouth		120,000	186,000	270,000
CALTRANS District 4 (Air Quality Report for I-580, Second Supplement, 4/74)				
Low			180,000	
High			220,000	
LAVWMA (includes Contra Costa County tracts)				
Joint Powers Agreement ?			150,000	150,000
State Division of Water Quality Eligible Capacities for Funding Purposes (includes Contra Costa County tracts)				
Existing Service Area	109,000	111,000	131,000	145,000
Future Service Area	112,000	114,000	135,000	149,000
Study Area	114,000	116,000	138,000	153,000

The developer of the proposed Las Positas New Town has contended that the growth which would occur as a result of the project's approval would not be premature and would not represent additional population in the Valley, but rather a redistribution of growth already planned to occur there. To support this position reference is made to the Alameda County Planning Commission's resolution recommending approval of the plan amendment in the Las Positas Valley. That resolution stipulated that in addition to redesignating areas north of Interstate 580 as requested by the applicant, the land uses in other parts of the Livermore Valley would be redesignated from residential classifications to ensure that the Valley-wide holding capacity is maintained at 220,000. As the table indicates, this figure is considerably higher than the range of projections being used by the State to determine the extent to which improvements to the Valley's wastewater treatment systems will be eligible to receive funding from the Federal Environmental Protection Agency. The State projections are based on 1975 Department of Finance population projections disaggregated to reflect the sub-county growth pattern reflected in ABAG's Series 2 Losouth series. While, as indicated above, the ABAG projections themselves have no policy standing, they are governed by a set of assumptions which are compatible with regional policies:

1. Urban land availability is constrained based upon the land use pattern in the Regional Plan diagram;
2. Higher densities than those in 1965 are projected;
3. Increased transit usage is assumed;
4. Increased redevelopment and in-fill in existing cities is assumed;
5. Calibration reflects other factors which influence the location and quantity of development such as physical amenities, accessibility speculation.

It should be understood that the indication on the Regional Plan diagram that the area north of Interstate 580 is suitable for residential development does not signify that any development proposed in this area is necessarily compatible with regional policies. It only shows that were Livermore to continue to grow at the same rate as it did in the decade of the Sixties, so that all available developable land were utilized, this area to which services could be extended from Livermore should be the next to be developed rather than allowing urbanization to occur in random fashion where it would not be an orderly extension of existing growth patterns. Of course, any development occurring in this area would itself have to be consistent with regional policies regardless of the jurisdiction responsible for its planning.

As also indicated, the extent to which such a development would have effects which would enable achievement of regional objectives can vary depending on the way the provision of public services is organized (e.g. a special district in an unincorporated area vs. annexation to an incorporated community).

On February 27, 1975, the Alameda County Local Agency Formation Commission acted to remove the Las Positas Valley from the City of Livermore's planning area. There are indications that the City believes that growth in this area at this time would be premature and would not be consistent with its attempts to formulate and implement a growth policy. The LAFCO action appears to conflict with regional policies which support the formulation of explicit growth policies by local jurisdictions.

Moreover, the variations between the County's own 1966 and 1972 projections and the projections of local, regional and State agencies involved in the planning and provision of services to accommodate growth indicate a need for far greater coordination of policies which deal with the timing and magnitude of growth in this area. The projections utilized by the County in making its decision on Las Positas and by CALTRANS in planning for improvements to Interstate 580 reflect a series of regional growth planning policy alternatives which assume, in conflict with ABAG and MTC policies, less public transit, greater reliance on the automobile and the continued spread of lower-density development into outlying areas of the region rather than the redirection of growth to existing cities by revitalization or infill.

Finally, the utilization of a higher set of population projections to justify the urbanization of previously undeveloped areas than is used to size the facilities required to service both new and existing development will likely result in an inequitable distribution of limited resources and may impose a fiscal burden on the residents of earlier developed areas who financed the original capital investment for required public services.

III. Findings/Recommendations

As a step toward achieving consistency with regional policies, a program to coordinate planning and governmental organization activities in the Valley should be undertaken by the County and local jurisdictions. One product of this effort would be an agreed upon framework of policies and a single range of growth projections to be utilized by all jurisdictions and special districts to guide planning and other governmental decisions regarding the location, timing and magnitude of development as well as the staging and sizing of facilities to service such growth.

FISCAL AND HUMAN SERVICES IMPACT

I. ABAG Policies

The Bay Area and its communities should be organized into a City-Centered Region.

Accordingly, urban growth in the region should be guided into or around existing or new communities.

Policies for open space, water, sewerage and transportation should be coordinated to guide the timing, location, growth and, where necessary, the limits of urban development.

Urban development should be organized to promote communities of sufficient scale to attract and support a wide range of convenient services and facilities and to provide focal points for wider regional identification.

(Regional Plan 1970:1990)

Communities should evolve through the organizing and strengthening of existing developed parts of the region and through the addition of planned new communities.

(Regional Plan 1970:1990)

One of the more serious problems which these policies seek to address is inefficiency in the delivery of public services and the unnecessary burden that this imposes on Bay Area citizens. So strongly is this concern felt that the ABAG General Assembly now requires:

Special justification ... for proposals which encourage scattered development not related to committed growth patterns or urban service areas and capability.

(General Assembly Resolution, October, 1973)

II. Relationship of Project to Regional Policies

In this vein, it is noteworthy that the site of the development proposal is not within the adjacent City of Livermore where an abundant amount of land is available for a wide range of development:

1,609 acres- residentially zoned land
210 acres- commercially zoned land
976 acres- industrially zoned land³⁰

All of this land is "improved" at this time, i.e. community facilities and services of the City of Livermore are available.³¹ Rather than being located so as to utilize these existing services (i.e. within the city) and, therefore, to reduce major capital costs for improvements, the development is proposed on an undeveloped site characterized largely by ranch and agricultural lands and a Federal Communications Commission facility.

"Las Positas" Residential Dwelling Unit mix

Number of dwelling units	% of total residential dwelling units	Characteristic housing type	Density (average gross)	Acreage absorption	% of total residential land	(4275 acres) % of total land
550	(4%)	Detached single family	1 d.u. @ acre	550	(20%)	(13%)
1250	(8%) 47%	Detached single family	3 d.u. @ acre	415	(15%)	(10%)
5300	72% (35%)	Primarily single family detached, some patio and cluster homes	5 d.u. @ acre	1060	91% (39%)	59% (25%) 48%
3700	(25%)	Attached e.g. townhouses and quadruplex	8 d.u. @ acre	465	(17%)	(11%)
4200	28%	Primarily 2 - 3 story garden apartments; also townhouses and midrise apartments	20 d.u. @ acre	210	8%	5%

15,000 Total Units

2700 Total Acreage

5.6 d.u. @ average gross residential acre

33

The distance of the proposed development from the Livermore service core is not the only aspect of the development proposal likely to increase service costs; the relatively low density nature of the residential component of the proposed development is also likely to be a contributory factor. Shown in the preceding table is the proposed dwelling unit mix of the development.

It is worthwhile noting that 91% of all the residential land would be absorbed by housing types at densities of eight dwelling units or less to the average gross residential acre. Of these dwelling units, the predominant housing type is the single-family detached house. Numerous studies attest to the higher costs of servicing low density development.³³ The relatively low density nature of the proposed development in conjunction with the distance of the proposed development from the service core of the City of Livermore would likely to result in higher service costs for the following reasons:³⁴

A. Public Works

Low density development requires more lineal feet of sewer mains, water lines, streets, storm drainage and street lighting. Operating costs are also usually higher for low density development since there is a greater area to maintain - more roads require re-surfacing and due to the greater impervious surface area, flooding, erosion, and sedimentation control costs are higher.

These costs are passed on to the public in the form of higher taxes or higher sales prices or rent levels for dwelling units.

Until the developer provides comparative and detailed cost information mitigating the forementioned trends, it must be assumed that the proposed development would result in the higher costs normally associated with development of this density and this distance from the service core of a city.

In addition to the higher costs that may be generated due to the residential density of the proposed development, there would be wasted funds due to inefficiency in service delivery.

B. Sewer

As indicated in the Water Supply and Water Quality section of this report, the demand represented by the proposed development would exceed both existing and projected treatment capacity (given the State's population holding capacity ranges for funding purposes).

Moreover, since the Alameda County Local Agency Formation Commission has excluded the proposed development from the sphere of influence of the City of Livermore,³⁵ it appears that a new taxing entity might have to be created to provide wastewater treatment services to the proposed development. In addition to being contrary to the policies of the California Regional Water Quality Control Board³⁶ LAVWMA³⁷ and the Alameda County Water District,³⁸ such action would likely result in duplication of service costs.

Irrespective of which entity provides wastewater treatment, costs would be higher due to the salt removal and tertiary level of wastewater treatment that the RWQCB would require as a condition to discharge permit approval.

*Against urban sprawl.
For open space.*

C. Water

As indicated in the Water Supply and Water Quality section of this report, while the supply of "raw" water is expected to be sufficient to meet the demands that the proposed development would exercise, the treatment capacity would be exceeded by the development. The expansion of treatment capacity would require both increased capital and operating costs.

D. Fire Protection

Studies have indicated that a key factor in determining fire protection costs is the time required to respond to calls.³⁹ In order to meet response time safety goals, more fire stations than the low density population of the proposed development will be able to afford may be necessary. The provision of a full range of fire fighting personnel and equipment would also probably not be cost effective for the proposed development. Both circumstances might have an adverse effect on fire insurance ratings - a cost which directly or indirectly is passed on to the public. Fragmentation of fire protection service appears to be a problem in the Livermore-Amador Valley now. In fact, mutual aid agreements have been entered into by the existing fire protection entities.

"Fire protection in the Livermore area is provided by three agencies. The City of Livermore Fire Department provides fire protection for the incorporated part of the area. It has three stations, with 43 regular and 17 on-call volunteer firemen. Its equipment includes four engines with 1250 gallons per minute (gpm) pumping capacity, one with 1,000 gpm capacity, and one with 750 gpm capacity, one grass fire rig, two pickups with pumps, and cars. In 1973, the Department responded to approximately 1,000 calls.

The Alameda County Fire Patrol is responsible for the control of forest, brush and grass fires in most unincorporated areas of the County. The Patrol's Livermore station maintains one 1,000 gpm engine, two 200 gpm grass fire rigs, a pickup, and a chief's car. The State Division of Forestry, Sunol Station, responds to all structural and vegetation fires in the unincorporated areas of the Livermore-Amador Valley. It maintains three 500 gpm units during the summer, and one during the winter. If necessary, aerial tankers, helitank units and crews, and other support assistance can be summoned from other Division of Forestry stations. Other Livermore-Amador Valley fire protection units include the City of Pleasanton Fire Department and the Valley Community Services District Fire Department."⁴⁰

A recent study has considered the option of consolidating fire protection services in the Livermore-Amador Valley.⁴¹

The proposed development might exacerbate the already inefficient situation, since as a result of the Alameda County LAFC decision, the development proposal is not within the City of Livermore's sphere of influence. Unless, therefore, a new fire protection entity were to be established or the proposed development became able to contract with existing fire protection entities, it would seem that the Alameda County Forest Service could have the primary responsibility for fire protection.

E. Police Protection

A key determinant of the cost of police services is the amount of time spent servicing calls for assistance. The low density nature of the development proposal would require greater travel time both in responding to calls and in patrolling. The greater travel time would result in more vehicle miles travelled and, therefore, increased gas consumption and vehicle deterioration. The number of police substations which may be necessary, given the crime rate are not likely to be justified from a cost-effectiveness standpoint.

Additional costs might be incurred due to an apparent duplication of services, i.e. since the LAFC decision has excluded the proposed development from the incorporated area of the City of Livermore, the Livermore police force would apparently not service the area. Since the developer makes no mention of a private security force, it must be assumed that police protection would be provided by the Alameda County Sheriff's Department headquartered in Oakland with substations in San Leandro and Santa Rita. The California Highway Patrol would, of course, provide service for State highway related calls.

F. Parks and Recreation

Under normal circumstances, the Livermore Area Park and Recreation District (LAPRD) would be the entity to provide park and recreation facilities and services to the site of the proposed development. The District ".... owns about 509 acres of land, and operates recreation programs on District, City and school facilities. It owns five recreation areas, and has programs on an additional ten City-owned and eight school-owned sites.

The City of Livermore Park District secures City park lands, and develops and maintains street trees and median strip landscaping. Approximately 250 acres of City-owned park and recreation areas are operated by the Livermore Area Park and Recreation District. The City has a park dedication ordinance, which requires developers to dedicate land or contribute a specific amount of money for park use as a condition of annexation and preliminary subdivision map filing."⁴² The proposed development, of course, would not be subject to this requirement given the Alameda County LAFC omitting it from the Livermore sphere of influence.

The LAFC is presently considering "reducing the boundaries of the LAPRD to be coterminous with the City of Livermore's sphere of influence."⁴³ If this were to occur, there might be the need to create a new entity for providing park and recreation services. The formation of such an additional agency to provide park and recreation services is opposed by the LAPRD.⁴⁴

Whether or not a new park and recreation entity were created, the proposed development would likely have a considerable impact on the East Bay Regional Park District (EBRPD). The system includes a number of facilities within close range of the proposed development: Chabot, Redwood, Las Trampas, Cull Canyon, Shadow Cliffs, Del Valle, and Sunol Parks, and Camp Ohlone. Yet the Park District boundary--and hence its taxing authority--

falls just short of the Livermore Planning Area. The fact that a jurisdictional problem exists has already been observed in the recently adopted plan of the EBRPD.

An inequitable situation exists ...in the eastern portions of Alameda and Contra Costa counties where reasonably good access to District facilities is available to non-district users who are not providing reciprocal opportunities for District residents (p. 14, "New Area Annexation Policy" Master Plan, EBRPD 1973).

If the situation with the existing City of Livermore can legitimately be described as "inequitable," this problem would only be exacerbated by the addition of approximately 45,000 people in an adjacent but non-annexed territory. Although this situation might be remedied by annexing the area of the proposed development into the EBRPD, there have been no formal proposals by the developer for this action. Until the issue is resolved, residents of the already developed portion of the East Bay would continue to subsidize a growing community of people who do not contribute a fair share to park and recreation costs.

G. Education

The Livermore Unified School District covers the eastern portion of Alameda County except for the Mountain House area in the San Joaquin Valley approximately 40% of the total county.⁴⁵ It also extends into southern Contra Costa County.

The school capacity situation of the District is serious:

grades K through 6 -	<u>at capacity</u>
grades 7 and 8 -	some residual capacity which is utilized by elementary students
grades 9 through 12-	<u>7% over capacity</u> ⁴⁶

Schools have been run on a double session basis for over three years.⁴⁷

It is expected that the proposed development would generate enough students to require:

- 9 additional elementary schools
- 2 additional intermediate schools
- 1 additional senior high school⁴⁸

Those additional facilities would represent major capital expenditures at a time when the Livermore Unified School District is straining its capacity limits, and while districts in other areas of the region notably San Francisco and parts of Santa Clara County are under capacity due to decreasing enrollment.

The Livermore area is part of the South Joint Junior College District which also includes the rest of the Livermore-Amador Valley, Eden Township (Hayward and San Leandro), and the San Ramon area in Contra Costa County. In addition to Chabot College in Hayward, a new junior college is under construction near the western boundary on the proposed development. Beginning enrollment of day students is projected at 500.⁴⁹

H. Health Care

From a regional perspective, the provision of health care services to the proposed development would raise issues similar to those raised in the area of education, namely, increasing capacity in the Livermore-Amador Valley while other areas of the Region - including Alameda County, have facilities that are underutilized.

I. Physical Health Care

The Livermore-Amador Valley is included in the California State Department of Health Facilities Planning Area 419. In this area are one hospital and three nursing homes. The Alameda County Health Care Services Agency provides services through two facilities in the Livermore-Amador Valley.

Estimates of demand for 1980 show that three of Alameda County's Health Service Areas have more beds for acute inpatient service (including those under construction) at present than will be needed in 1980. Health service area 419 (Livermore) is the only with a documented need of acute beds, 17 overall.)

Estimate of Demand for Total
General Hospital Acute Inpatient Services - 1980
(Medical/Surgical, Pediatrics, Obstetrics, and Psychiatric)⁵⁰

	<u>HSA</u>	<u>Need</u>	<u>Licensed Beds Available</u>	<u>Deficit/(Surplus)</u>
Berkeley	415	418	494	(76)
Oakland	417	1528	2247	(719)
Livermore	419	127	110	17
Hayward	421	1227	2180	(953)
Totals		3300	5031	(1731)

The proposed development appears, then to conflict with the guidelines for the distribution of hospital facilities established by the Bay Area Comprehensive Health Planning Council:⁵¹

"The overall acute inpatient service capacity system of the hospital system must be equitably distributed and kept in balance with demonstrated needs of each of the health facility planning areas in the nine Bay Area counties."

The location of the proposed development in the Livermore-Amador Valley would also pose problems in terms of accessibility to health care services. The BACHPC guidelines are again relevant:

"Hospital services should be distributed to support and promote health care which is accessible to the population being serviced. Convenient access to hospital services by auto and public transportation is essential.

1. As recommended in the State Plan for Hospitals, hospital acute inpatient services should be available within 30 minutes automobile travel time in urban and suburban areas.
 - a) In urban areas with high population density, hospital services should be available to consumers within a radius of 10 miles, based upon an average accomplished mile-per-hour auto speed of 20 mph.
 - b) In suburban areas with medium population density, hospital services should be available to consumers within a radius of 15 miles, based upon an average accomplished mile-per-hour auto speed of 30 mph.
2. As recommended in the State Plan for Hospitals, hospital acute inpatient services should be available within one hour automobile travel time for people to be served in rural areas, or within a radius of 45 miles based upon an average accomplished mile-per-hour auto speed of 45 mph.
3. Convenient access to hospital services by consumers using public transportation should not require more than one and one-half times the travel time required when using an automobile. Where public transportation services are inadequate or unable to meet this guideline, hospitals should take the initiative with transportation authorities in promoting improved transportation services and in providing alternative transportation (jitney, Medi-cab services, etc.) or linkages to transportation systems when necessary."

Since the Livermore Valley facilities are geared primarily to general care, future residents of the proposed development would have to travel outside the valley to receive tertiary care services, e.g. kidney dialysis, heart surgery, burn facilities, etc. Generally, the travel time limits would likely be exceeded for residents of the proposed development, particularly for emergency care.

It should also be noted that difficulties have been experienced in securing physicians for provision of primary care services in the Livermore Valley.⁵²

J. Mental Health Care

The Livermore-Amador Valley is part of the Washington Public Health District which includes Union City, Fremont and Newark.

The Alameda County Plan for Mental Health Services for FY 74-75 is predicated upon the Five Year Plan 1972-1977. The basic goal of which "... is the reduction or prevention of the impairments associated with mental disorder, mental retardation, and drug and alcohol abuse."⁵³

It is estimated that of the 139,200 children with the Washington Public Health District (U.S. Census, 1972 data) "... 792 are psychotic; 3,480 have disorders severe enough to require psychiatric intervention, while 12,528 suffer from emotional disturbances needing the assistance of child development specialists, nurses, social workers and other ancillary personnel."⁵⁴

The overview of the Alameda County Planning for Mental Health Services identifies the two most outstanding characteristics of the Livermore-Amador Valley subdistrict as being rapid growth and youth. (37% of the population is under 15 years of age) - the highest concentration of this age group in Alameda County.

Although the developer has provided little information on the demographic profile of the proposed development,⁵⁵ it can be conservatively estimated based on the information provided that at least 10,775 people or 26% of the proposed development would be between the ages of 5 and 17.

The proposed development, therefore, would infuse a significant young population in an area whose mental health facilities are already overburdened:

"Responsiveness to such vast needs far transcends the parameter of the public health district's present as well as projected capability ..." (underlining supplied).⁵⁶

K. Conclusions

It is clear from the preceeding, that the proposed development does not "show a commitment to the in-fill of areas already committed to a development pattern reflecting availability of community facilities and services."⁵⁷

For some public services (notably, education and health care), development at the proposed location would mean incurring major capital costs for new facilities when existing facilities in other parts of the region are underutilized.

For other public services (police, fire, sewage treatment), higher costs would likely to result not only due to the location, but also due to the residential density of the proposed development and the creation of new service providing entities. This latter problem would be compounded by the exclusion of the proposed development from the sphere of influence of the City of Livermore.

In light of the LAFCO decision, the question must be posed, what entity would provide basic municipal services to the proposed development?

If the new entity were to take the form of a community services district, the range of services it would have to provide to the proposed development would be extremely difficult to support, given the financial constraints of community services districts. "Community services districts are limited (in taxing authority) to \$1 per \$100 of assessed valuation without electorate approval. (Community Services districts) may assess fees for services, however, these fees

may not be levied as a lien on the property and the district would be without authority to collect. Sources of revenue such as sale and cigarette taxes available to cities are not available to districts." - according to Ms. Lila Euler, representing the Board of Directors of the Valley Community Services District, which has opposed the formation of a new agency for providing necessary services to the proposed development.

If the entity created were a county services area, as representatives of the developer have suggested, similar constraints may be present. "Our experience with county services areas such as Dublin - San Ramon, is that once established the residents refuse to incorporate and the area continues to grow and sprawl without the restrictions of the State Subdivision Map Act. The proliferation of these service areas and single-purpose districts is a threat to established general law cities since we must provide the full range of services to our citizens who then must pay much higher taxes to the county to service these areas of unincorporated growth." ⁵⁹60

The creation of a new political or taxing entity, whether it be county service area, community service district, or even incorporation of the proposed development as a separate city, appears to contradict not only the aforementioned policies of the ABAG Regional Plan, but also those of the Alameda County General Plan which indicates that "whenever possible, existing communities should serve as nuclei for future cities", ⁶¹not to mention those policies of the Knox-Nisbet (Local Agency Formation Commission Act) Government Code #54773 et seq.. "Formation of a new political entity is the last alternative. Whenever a new political or taxing entity is indicated, the formation of a self-governing special district is the least desirable." ⁶²With specific reference to the proposed development, the Alameda County Local Agency Formation Commission has said: "Exclusion of the area of the proposed development from the proposed sphere of influence is contrary to Local Agency Formation Commission policy of giving preference to expansion of existing agencies rather than formation of new ones." ⁶³

In fact, the proposed development could offset the benefits that the Local Agency Formation Commission hoped would be achieved when it limited Livermore's expansion by means of the sphere of influence determination. "... these (benefits i.e. lessening of regional problems, particularly in the areas of air and water quality and transportation) could be more than offset if the development which would have taken place within the Livermore area were to be forced elsewhere or if new political entities (underlining supplied) would be formed as the result of the limitations. Impacts would be particularly significant if the latter took place, as it would involve the possibility of additional agencies that would have to be coordinated and integrated into existing policies, and would contribute to existing problems and the level of interagency or interarea competition for ... available resources, monies, and amenities." ⁶⁴

III. Findings/Recommendations

Since, according to the Alameda County LAFC⁰, "the proposed sphere of influence leaves the question of development of Las Positas Valley open"⁶⁵, the following actions could be recommended:

- A. The Alameda County LAFC put the area represented by the proposed development into an unincorporated preserve, to remain undeveloped until such time as the conditions mentioned in this report make the development no longer premature. In the interim, growth should be channeled to appropriate existing urbanized areas. At that time, consistent with ABAG policy on guiding the time and location of new urban development by releasing lands on a scheduled basis, the LAFC should consider the inclusion of the area within the sphere of influence of the City of Livermore. Complete and in-depth cost-benefit analyses should be undertaken by the Alameda County LAFC, perhaps in conjunction with Alameda County and the City of Livermore prior to such a determination.
- B. The Alameda County Plan could be amended in accordance with the above recommendation.
- C. Alameda County, the City of Livermore and other service-providing entities in the subject area should establish tools for the ongoing analysis of the cost/revenue impacts of development. These tools should become an instrumental part of the process of preparation and review of specific plans.
- D. The residential density of development as well as other aspects of development proposals should be closely examined to ascertain the impacts of proposed development on the delivery of human services.

ECONOMIC DEVELOPMENT

I. ABAG Policies

Growth of employment within the inner-city cores of existing communities should be given high priority.

Maximum employment opportunities should be available to residents within their own communities.

The location of employment and the timing of its development are critical to the success of the City-Centered Region. All compatible types of employment should be located within or adjacent to communities.

(Regional Plan 1970:1990)

Job training programs and economic opportunities in the major labor market of the region. . . should be closely matched to foster greater access to all, and especially disadvantaged population groups.

(General Assembly Resolution,
October, 1974)

Living, working and shopping within the same community should be planned and promoted by all levels of government and the private sector. To make this possible, a wide range of well-served residential units convenient to urban centers of employment will be required. The need for long commuting should be reduced.

(Regional Plan 1970:1990)

Existing community centers which are becoming blighted should be rebuilt through coordinated policies and programs at all levels of government.

(Regional Plan 1970:1990)

. . . all major proposals will be reviewed to determine the extent to which the action would expand job and income opportunities for disadvantaged groups.

(General Assembly Resolution,
October, 1974)

There must be improved access to job opportunities through . . . creation of new job centers near areas of recurring high unemployment.

(General Assembly Resolution,
October 1974)

Special justification shall be required for projects that would diminish access to jobs for all and especially economically disadvantaged groups or increase regional dependency on long job-residence commuting.

(General Assembly Resolution,
October 1974)

II. Relationship of Project to Regional Policies

In order to meet the developer's stated goals of economic self-sufficiency, 15,960 jobs would need to be created for the projected population of 42,000 (Based on assumptions reflected in Real Estate Research Corporation report). At completion the development is projected to contain nearly 9,000 jobs: ⁶⁶

New Town Employment Estimates 67

<u>Employment Areas</u>	<u>Total Employment</u>
Commercial	<u>2,075</u>
Town Center	800
Village Centers	840
Neighborhood Centers	435
Industrial Park	<u>5,760</u>
Public and Institutional	<u>1,030</u>
Total Employment	<u>8,865</u>

It is apparent from these figures that even if the proposed development were to attract the 8,865 jobs claimed, that achievement would nevertheless be substantially below the amount needed by the proposed development's resident labor force, resulting in the necessity for a substantial amount of out-commuting by the resident labor force. That conclusion is borne out by the developer's projections of work place destination for the resident labor force of the proposed development.

Resident Labor Force 68

Work Place	Percent of Projected Resident Labor Force	Persons
Proposed Development	30%	5,000
City of Livermore Industrial Complex, including Lawrence Livermore Laboratory	25%	3,800
City of Livermore -- other	5%	760
East Valley (East of City of Livermore, San Joaquin County)	5%	760
San Francisco, Berkeley, Albany, Emeryville, Piedmont, Alameda, Park District, San Leandro, Hayward, Castro Valley, Pleasanton, and Dublin	35%	5,320

As indicated in the chart above, only three out of every ten members of the resident labor force would be working in the proposed development. Approximately 35% would be commuting to the job centers of the East and West Bay, according to the developer's projections.

It is important, however, to examine the likelihood of attracting even 8,865 jobs. If the claim is not realistic, a number of adverse effects would result:

- For the developer, the rate and amount of employment growth would be a vital part of his cash flow projections, upon which often hinges the credibility and success of the investment;
- For the future residents, it would mean the difference between a socio-economically balanced community and yet another bedroom community and absent a wide range of services and amenities;
- For the city or other entity providing services to the development, it could mean the difference between fiscal solvency and fiscal crisis;
- For the region, it could mean long commuting patterns for employed residents with the attendant complications of already serious air pollution and traffic congestion.

In examining the jobs called for in the proposal it is important to focus on "basic" jobs since by definition jobs of this nature respond to a demand external to the project area. Basic jobs, therefore, are key to the economic viability of a community.

In this vein, there are serious discrepancies between the developer's claims and the findings of the market analysis undertaken by the developer's own consultants. ⁶⁹

It is important to realize that economic development does not occur in a vacuum. The location of industry in a particular community occurs only after reasoned consideration of a host of factors, such as the availability of industrial land, its sales price or rent range, labor force availability, competent industrial park management, and other factors. The competition among sites in attracting industry is reflected in the Real Estate Corporation report:

"The market potential for industrial sites at Las Positas will be determined by competitive supply conditions as well as by the level of demand." ⁷⁰

The proposed development "...faces the competition of ample quantities of better-located industrial land -- much of which is being competently marketed." ⁷¹ The Bay Area Council in a 1970 survey identified over 10,000 acres of vacant industrially zoned land in Alameda County, as indicated in the table below. ⁷²

Zoned Industrial Land, Alameda County, 1970

	<u>Total Acreage</u>	<u>Vacant Area</u>	<u>Percent Vacant</u>
<u>Southern Area</u>			
Fremont	5,700	4,275	
Newark	1,313	683	
Hayward	2,354	1,267	
Union City	1,200	600	
Total:	10,567	6,825	64.6
<u>Central Area</u>			
Berkeley	434	308	
Oakland	3,900	N/A	
San Leandro	2,200	+ 660	
Total:	6,534	- 1,000	15.3
<u>Eastern Area</u>			
Livermore	630	567	
Pleasanton	2,000	+ N/A	
Total:	2,630	- 2,500	95.1
<u>Total Alameda Co.</u>	19,731	10,325	52.3

Source: San Francisco Bay Area Council

Given Alameda County's historic (1954 to 1972) industrial land absorption rate of 134 acres each year,⁷³ it would take 77 years for the 10,300 acres of vacant industrial land mentioned above to be absorbed. Site cost is another factor often considered by industrial firms seeking to locate in an area. In the table below it is apparent that the City of Livermore has the lowest-priced land of the selected cities in Alameda County, yet the city still has a significant amount of vacant industrially-zoned land.

Alameda County Industrial Land Values -- 1972
Price Range Per Acre ⁷⁴

Berkeley	\$ 70,000	--	\$ 85,000
Emeryville	100,000	--	140,000
Fremont	15,000	--	45,000
Hayward	25,000	--	70,000
Livermore	7,500	--	20,000
Newark	15,000	--	25,000
Oakland	50,000	--	135,000
Pleasanton	15,000	--	45,000
San Leandro	55,000	--	75,000
Union City	25,000	--	50,000

Source: Society of Industrial Realtors

Although there are some technical questions concerning certain methodological assumptions (e.g. the exclusion of industrial parks owned by railroads and the 600 acre City of Livermore industrial park from the competitive market of the proposed development) of the Real Estate Report,⁷⁵ by and large the report is found to be analytically sound and a reasonable projection of existing trends in industrial growth for the study area ("central," i.e., population and job intensive and suburban Alameda County). This report took into consideration the competitive supply conditions, the demand for industrial land and the marketing of the proposed development as a new community.⁷⁶ On the basis of these and other factors, the report forecasts that the demand for industrial land in the proposed development would be between 116 and 129 acres over the life of the project, at the following rate: ⁷⁷

1975-1980	--	11.5 acres
1980-1985	--	33.3 acres
1985-1990	--	36.7 acres
1990-1995	--	36.7 acres

This is in contrast with the 290 acres stated by the developer in the proposed amendment to the Alameda County General Plan and strongly suggests that the job expectations of the proposal are premature.

Employment density of the proposed development can be anticipated as ranging between 15 and 20 employees per acre;⁷⁸ "on this basis, 120 acres put into use would generate between 1800 and 2400 jobs." This sharply contrasts with the claim of 5760 industrial jobs.⁷⁹ While the report identified three "additional potential sources of demand," the proposed development would face serious obstacles in attracting such sources, because of:

- "its relative distance from major centers of activity"
- "Its relative distance from sources of supply for workers in the less skilled occupational categories"
- "the availability of substantial quantities of good industrial land in superior locations"
- "the lack of rail services"⁸⁰

III. Findings/Recommendations

Whether the developer would attract the 8,865 jobs claimed or an adjusted 5,285 consistent with the findings of the industrial market analysis,⁸¹ the result is that a large amount of the resident labor force would be out-commuters. Such a situation would conflict with all three of the ABAG "Organization of a City-Centered Region" policies.

Moreover, since the site of the proposed development can scarcely be considered as being near an area with recurring high unemployment or a high incidence of disadvantaged groups, the proposed development appears to seriously conflict with both the ABAG Human Resources Objective and the Review Criteria.

According to the most recent comparable data available (1970 U. S. Census) unemployment in the Livermore-Amador Valley (including San Ramon) was significantly lower (4.3%) than in the San Francisco-Oakland Area as a whole (5.8%). Unemployment rates have risen substantially since that time. In absence of hard data and other evidence to the contrary, it must be assumed that the most serious unemployment problems continue to be located outside the Valley.

The median family income according to the U. S. Census (1970 data) was \$14,004. 32% of the tri-valley area families had incomes between \$15,000 and \$24,999. 20.5% had incomes between \$12,000 and \$14,999. This is compared with a median family income of \$11,802 for the San Francisco -Oakland SMSA.

Finally, the proposed development might indirectly exercise a negative influence on the effort to revitalize the blighted community centers (ABAG Community Center policy) since the development would be competing for jobs within a market area defined as including Oakland, Berkeley, etc.

It is recommended that:

- A. public and private entities jointly outline a feasible economic development program with incentives to provide:
 - a job balance in the Valley which reflects the serious environmental problems;
 - a job skill mix supportive of an economically balanced population ; and
 - specific controls against attracting jobs from areas of serious economic distress.

HOUSING

I. ABAG Policies

The location of residential development and the condition of the living environment will be key factors in meeting regional goals. All governmental levels as well as the private sector should assist in providing in each community, the maximum of housing choices in terms of location, style, neighborhood, and price. These choices should uphold the local plans to meet the social and economic needs and desires of residents.

Private and public programs providing more low and moderate income housing of good design and healthy environment should be assisted.

Employers should be encouraged to provide housing for their workers in open, attractive neighborhoods near the place of employment so that home-to-work distances are shortened.

(Regional Plan 1970:1990)

Projects should show an understanding of, and commitment to, fulfilling the community or area role in meeting the housing needs of the Bay Area with specific provisions for accommodating low- and moderate-income housing. Special justification shall be required for proposals which would have the effect of restricting location of housing choices for low- and moderate-income and minority families in areas of existing concentration of these population groups.
(underlining supplied)

All major proposals will be reviewed to determine the extent to which the action would:

Expand housing opportunities for low income households.
(General Assembly Resolution, October 1973)

II. Relationship of Project to Regional Policies

The dwelling unit mix for the proposed development is shown on the next page. It is noteworthy that 47% of the dwelling units are proposed for primarily single family detached homes. Only 28% of all dwelling units are proposed at the "High Medium" density category. This category, which represents the most dense residential land use of the project, is to be characterized largely by 2 or 3 story garden apartments.⁸²

Thus far, the developer has provided none of the following information which would facilitate a determination of whether the residential component of the proposed development is consistent with regional policies:

- the areas from which the prospective residents would be drawn (market area);
- the residential profile that is the target of the developer's marketing plan, including:
 - the anticipated number of sales and rental units;
 - the anticipated sales prices and rent ranges of these units;
 - the anticipated bedroom mix;
 - the anticipated age, sex, family type, etc., of the proposed population.
- specific provisions for accommodating low and moderate-income housing.

"Las Positas" Residential Dwelling Unit mix

Number of dwelling units	% of total residential dwelling units	Characteristic housing type	Density (average gross)	Acreage absorption	% of total residential land	(4275 acres) % of total land
550	(4%)	Detached single family	1 d.u. @ acre	550	(20%)	(13%)
1250	(8%)	Detached single family	3 d.u. @ acre	415	(15%)	(10%)
5300	<u>72%</u> (35%)	Primarily single family detached, some patio and cluster homes	5 d.u. @ acre	1060	<u>91%</u> (39%)	<u>59%</u> (25%)
3700	(25%)	Attached e.g. townhouses and quadruplex	8 d.u. @ acre	465	(17%)	(11%)
4200	28%	Primarily 2 - 3 story garden apartments; also townhouses and midrise apartments	20 d.u. @ acre	210	8%	5%

15,000 Total Units

2700 Total Acreage

5.6 d.u. @ average
gross residential acre

Over and beyond the dwelling unit mix issue, there is the question of whether the proposed development will be able to create a significant number of jobs at occupation levels within the competitive reach of low and moderate income people. As indicated in the economic development section of this report, that does not appear likely.

In the absence of the above information, an analysis was undertaken relating proposed dwelling unit mix to Bay Area housing market data in an attempt to estimate sales prices or rent ranges for the proposed development. The analysis has relied heavily on data drawn from private sector sources:⁸³

Based on the following factors:

1. average Bay Area construction costs as of April 1974;⁸⁴
2. housing market information for the South Central Contra Costa and East Alameda County area (April 1974);⁸⁵
3. field investigation, ABAG staff estimates the sales prices and rent ranges of the proposed dwelling unit mix would likely be:
 - a. single-family detached dwelling units
(i.e. approximately 47% of all proposed dwelling units) — approximately \$60,000 or higher
 - b. attached dwelling units at densities of 8 d.u @ acre
(25% of all proposed dwelling units) — approximately \$40,000 or higher
 - c. garden apartments
(i.e. approximately 28% of all proposed dwelling units)
 - 1) if sold, (condominiums) — approximately \$30,000 and up
 - 2) if rented, — approximately \$200 and up (2 bedrooms)

The above estimates are for the year 1975. Therefore, when value increases over the life of the proposed development are considered, the actual sales prices and rent ranges are likely to be higher and less likely to be within the reach of low and moderate-income people.

These estimates should be considered in light of the housing need issue in Alameda County:

Alameda County households needing housing;⁸⁶
owner households 15,367
renter households 103,935

III. Findings/Recommendations:

It can be concluded, on the basis of available information, that in the absence of substantial private and public subsidies, the dwelling unit mix of the proposed development would create what appears to be an insurmountable barrier to the provision and retention of a significant amount of low and moderate income housing.

In the absence of specific provisions for accommodating low and moderate income housing, the proposed development would not support a "commitment to fulfilling the community or area role in meeting housing needs of the Bay Area."

Moreover, in light of the fact that the proposed development could absorb nearly all of the remaining population holding capacity of the Livermore-Amador Valley according to recent estimates,⁸⁷ the proposed development can be viewed as restricting the location of housing choice for low and moderate income families, which would clearly conflict with the ABAG policies.

With respect to the availability of public mechanisms to aid in the provision of low and moderate income housing for the proposed development, on the local level, the Alameda County Housing Authority has provided only 146 or 27 percent of all leased housing units (as of May 1973) in the unincorporated areas of the county (see table next page). Moreover, few, if any, of the public housing units in Alameda County are owned by the County housing authority.

The City of Livermore has in addition to 27 leased housing units, 150 public housing units, 54 senior citizen housing units operated by an Interfaith Council; and approved permits for 96 FHA 236 housing units.⁸⁹

However, it is important to note that the anticipated creation of a State Housing Finance Agency, and the provision of funding under Section 8 of the Federal 1974 Housing and Community Development Act represent two public mechanisms which might make provision of low and moderate income housing more feasible. In addition to these mechanisms, the following should be considered for implementation:

1. The developer could underwrite the cost of land so as to reduce housing cost;
2. major employers could assist with subsidies for the cost of housing for workers;
3. the developer, Alameda County (or other entity responsible for providing municipal services) could establish, consistent with the law, a housing development corporation, or revolving loan fund, to insure that low-moderate income units are provided throughout the life of the project;
4. the county (or other entity responsible for providing municipal services) could take necessary legal steps to mandate that a certain percentage of the total housing units be allocated for low and moderate-income people as a condition to specific plan approval;
5. the county could offer density incentives to the developer for the provision of low and moderate income housing.

LOCATION OF ALAMEDA COUNTY HOUSING AUTHORITY LEASED HOUSING UNITS⁸⁸

May 31, 1973

<u>Location</u>	<u>Leased Units</u>
Castro Valley (U)*	16
Fremont (city)	159
Hayward (city)	118
Hayward area (U)	54
Livermore (city)	27
Newark (U)	70
Pleasanton (U)	1
San Leandro (city)	3
San Leandro area (U)	5
San Lorenzo (U)	1
Union City (city)	<u>85</u>
TOTAL	540

* U = Unincorporated

TRANSPORTATION

I. ABAG Policies

More efforts should be directed toward achieving a balance and integration of various transportation modes and facilities In addition, strong emphasis should be placed upon the development of intra-city systems of mass public transit.

(Regional Plan 1970:1990)

Special justification shall be required for projects that would diminish access to jobs for all and especially economically disadvantaged groups or increase regional dependency on long job-residence commuting.

(General Assembly Resolution, October 1974)

Plan and projects should contain provisions which: 1) provide alternative means of travel, particularly public transit in lieu of reliance on the automobile as the basic transportation mode for daily life.

✓ Special justification (underlining supplied) shall be required for proposals which indicate a continued reliance on the automobile with attendant highway fuel and air pollution costs.

(General Assembly Resolution, October 1973)

Metropolitan Transportation Commission Policies

Transportation programs will be designed to reduce dependence on the automobile as a transportation mode.

(Regional Transportation Plan, August 1974)

II. Relationship of Project to Regional Policies

The transportation component of the proposed development is predicated on four major elements: (1) the anticipation of a BART extension to the City of Livermore with a link to the proposed development; (2) the likelihood of express bus service to East Bay job centers; (3) major access by way of Interstate 580 and possibly 84, and (4) a bus system internal to the proposed development.

While the possibility of a BART extension to Livermore does exist, that possibility must be considered remote at the present time. Four alternative BART extensions are currently under consideration by MTC to be included in its 10-year capital improvements plan: A link to the Oakland Airport, a link to the San Francisco Airport, an extension to the Pittsburg-Antioch area, and an extension to the Livermore-Pleasanton area. Since funding is available for only one of the four, the Livermore-Pleasanton extension faces serious competition. The cost of an extension from the Bayfair BART station to the Livermore area is estimated at \$250,000,000 (1973 dollars). A link from a proposed Livermore station to the proposed development is estimated to cost an additional \$31,000,000.⁹⁰

A link from Livermore to the area of the proposed development was not extensively considered in the Livingston and Blayney report and was, in fact, dropped from the alternative routes in the study.

A BART extension from Bayfair to Livermore and a subsequent link to the proposed development would also not likely be justified on the basis of the population of the proposed development.⁹¹ According to the developer's projections of the project's resident labor force, (shown in the table) only 35 percent of the resident labor force, or 5,320 people would be out commuters to the East Bay area. Even assuming that all such out commuters would be BART patrons, this level of demand would scarcely justify a \$31,000,000 link.

Moreover, since the population holding capacity for funding wastewater treatment facilities is 145,000 to 153,000 by the year 2000, according to the State Division of Water Quality, even including any added demand that this population might represent would not likely make a BART extension any more justified from a cost effectiveness standpoint.

Resident Labor Force

<u>Work Place</u> ⁹²	<u>Percent of Projected Resident Labor Force</u>		<u>Persons</u> ⁹³	
Proposed development	30%		5,000	
City of Livermore Industrial Complex including Lawrence Livermore Laboratory	25%	70%	3,800	10,640
City of Livermore - other	5%		760	
East Valley (East of City of Livermore, San Joaquin County)	5%		760	
San Francisco, Berkeley, Albany, Emeryville,	35%		5,320	
Piedmont, Alameda, Park District, San Leandro, Hayward, Castro Valley, Pleasanton, Dublin				
TOTAL	<u>100%</u>		<u>15,640</u>	

Current plans for service to the Livermore-Pleasanton area envision an extension of the BART feeder bus service from the current 12 busses to approximately 100 busses in 1985. At that time, the feasibility of an extension of the BART system to the Livermore-Pleasanton area would be reassessed.⁹⁴ Although this availability of bus service to East Bay BART stations is a factor in the proposed development's favor, in order to ascertain whether the provision of this service will substantially reduce auto dependency, further information including the anticipated bus patronage of the proposed development would be necessary. According to the U. S. Census (1970 data) 80% or more of the residents of Livermore-Amador and San Ramon Valley area are dependent upon the automobile for jobs, work and business, and shopping.

While the expansion of Interstate 580 to 8 lanes (soon to begin construction), will improve accessibility to and from the proposed development, it will not decrease auto dependency on the part of the population. In fact, since the expansion of Interstate 580 will precede any extensions of the BART system, the highway expansion may foster auto-dependency.

The developer has indicated that two interchanges, in addition to the four existing, will be necessary; one, to provide access to the proposed "town center," in conjunction with an anticipated realignment of Route 84; the other to service an industrial area north of the Lawrence Livermore Laboratory. The costs of constructing the additional interchanges would range from 2 to 5 million dollars each, according to recent estimates.⁹⁵ Neither of the two additional interchanges is included in the MTC 10-year Capital Improvements Plan. Moreover, CALTRANS has indicated that⁹⁶ it intends to de-certify Route 84 Realignment from the State Highway Plan, thereby removing it from consideration for an indefinite period of time to exceed at least 8 years. Updated traffic studies, taking into account this decision, will be necessary.

Irrespective of these improvements, the proposed development would use existing interchanges and streets of the City of Livermore, and in at least one case would generate sufficient additional traffic to exceed street capacity.⁹⁷

The development proposal calls for an internal bus system. Experience has shown that such systems require hi-density nodes of population in order to be cost effective.⁹⁸ Although the proposed development calls for 28 percent of the total residential dwelling units to be at densities of 20 dwelling units an acre, the housing stock of the proposed development is predominantly low-density single-family in nature (72% of the dwelling units at densities of 8 d.u.'s per acre or less).⁹⁹ This characteristic does not appear conducive to the cost effective provision of an internal transit system. A hi-density BART dependent development alternative that was rejected¹⁰⁰ by the developer might have been more conducive to the feasibility of both an internal bus system and an extension of BART. Thus far, the developer has made no mention of any financial commitment on his part to fund such a system. A feasibility study of the internal bus system would be necessary.

III. Findings/Recommendations

In light of the following factors:

- (1) there will be no near term extension of the BART system to either the City of Livermore or the proposed development;
- (2) lack of information on the anticipated patronage of the BART feeder bus service in the face of a high Livermore-Amador Valley out commuter rate;
- (3) precedential effect on autodependency of the expansion of Interstate 580;
- (4) absence of a feasibility study and financial commitment on the part of the developer for the internal bus system.

At this time, it must be concluded that the development proposal is premature and would foster "continued reliance on the automobile," in conflict with the policies of the ABAG Regional Plan.

The high density BART dependent development alternative considered by the developer might have proven more consistent with regional policies relating to transportation.

NEW COMMUNITIES

I. ABAG Policies

All levels of government should foster and assist in the development of entirely new planned communities or the planned expansion of some existing small settlements into new communities. The plans for these new communities should support the objectives for a City-Centered Region. When fully developed, they should contain at least 100,000 people and should provide employment opportunities in proportion to the number of resident workers. New communities should be served by regional rapid transit and freeway facilities. Sites for this kind of development should be reserved at any early date.

(Regional Plan 1970:1990)

Urban development should be organized to promote communities of sufficient scale to attract and support a wide range of convenient services and facilities.

(Regional Plan 1970:1990)

National policies

Title VII -Urban Growth and New Community Development Act, 1970

ELIGIBLE NEW COMMUNITY DEVELOPMENT

Section 712 (a) A new community development program is eligible for assistance under this part only if the Secretary determines that the program (or the new community it contemplates) --

- (1) will provide an alternative to disorderly urban growth, helping to preserve or enhance desirable aspects of the natural and urban environment or so improving general and economic conditions in established communities and to help reverse migration from existing cities or rural areas;
- (2) will be economically feasible in terms of economic base or potential for economic growth;
- (3) will contribute to the welfare of the entire area which will be substantially effected by the program and of which the land to be developed is a part;
- (4) is consistent with comprehensive planning, physical and social, determined by the Secretary to provide an adequate basis for evaluating the new community development program in relation to other plans (including State, local, and private plans) and activities involving area, population, housing and development trends, and transportation, water, sewerage, open space, recreation, and other relevant facilities;
- (5) has received all governmental reviews and approvals required by State or local law, or by the Secretary;
- (6) will contribute to good living conditions in the community, and that such community will be characterized by well balanced and diversified land use patterns and will include or be served by adequate public, community, and commercial facilities (including facilities

needed for education, health, and social services, recreation, and transportation; deemed satisfactory by the Secretary;

(7) make substantial provision for housing within the means of persons of low and moderate income and that such housing will constitute an appropriate proportion of the community's housing supply; and (8) will make significant use of advances in design and technology with respect to land utilization, materials and methods of construction, and the provision of community facilities and services.

Section 712 (b) A new community development program approved for assistance under this part shall be undertaken by a private new community developer or State land development agency approved by the Secretary on the basis of financial, technical, and administrative ability which demonstrates capacity to carry out the program with reasonable assurance of its completion.

II. Relation of Project to Regional Policies

The developer is to be commended for the following aspects of the proposed development which appears to be consistent with the forementioned policies:

- The assembling of a large site;
- The proposed dedication of a significant amount of "open space;"
- A broader range of land uses than conventional development; although insufficiently dense;
- The provision of an internal bus system; assuming feasibility;
- The provision of cultural and institutional space within the town center and other areas of the proposed development;
- The phasing of development, of related to a cost/revenue analysis system of the service providing entity.

Due to constraints largely beyond the control of the project, the proposed development (as indicated in the Air Quality section of this report) will exacerbate air quality problems. In the face of this condition, the proposed development cannot be viewed as "enhancing desirable aspects of the natural environment".

The proposed development is not likely "to improve general and economic conditions in established communities as to reverse migration from existing cities or rural areas". In fact, when the auto-dependent, high-out commuting characteristics of the proposed development (see Transportation section of this report) are considered, the proposed development may have the opposite effect. It may attract higher-income residents from existing urbanized areas who will still be reliant on these areas for employment.

As indicated in the Housing section of this report, the developer has made no specific provision for accommodating low-and moderate-income persons. Moreover, there will be no near term extension of the BART system to the area of the proposed development.

Additionally, since development at the proposed location will mean incurring major capital costs for new facilities (especially health and educational facilities) when existing facilities in other parts of the region are underutilized, it is not likely to "contribute to the welfare of the entire area which will be substantially affected by the proposed development" (see Fiscal/Human Services Impacts section of this report). Moreover, the proposed development is not consistent with plans and policies of some local agencies in the Valley.

It is not likely that the proposed development will be "economically feasible in terms of an economic base" given the small amount of "basic" jobs projected relative to the size of the resident labor force:

Resident Labor Force: 15,640

Basic Employment: 1,800 - 2,400 jobs

(See Economic Development section of this report). This slow rate of industrial growth may have an adverse affect on both the financial feasibility of the proposed development and the tax base of the entity providing services to the development.

The financing of a new community often requires millions of dollars of "front-end" money. This is needed not only to purchase the land but also for the heavy technical, administrative and marketing overhead and for the initial investment in streets, utilities, community facilities and amenities which must be put in early to make the development credible and attractive, as well as the carrying charges on the debt associated with the forementioned. Revenues begin to trickle in several years after the process is under way. Timing is essential to the development process. If the rate of sales is slow, carrying charges continue to mount and profits are deferred and diminish its present value, possibly even becoming losses.¹⁰¹

It is noteworthy that problems of attracting industry and labor to new and remote locations have been a major reason for the financial failure of many recent new community ventures. In large part due to this factor, the Federal New Communities Program on January 14, 1975, was temporarily suspended in order to allow for concentration on efforts to maintain the solvency of projects already approved.

Financial insolvency of a new community will have adverse effects on the entity providing basic municipal services and on any special entity established by the developer for providing the increased amenities so crucial to the marketing success of a new community. For example, water and sewer facility costs are usually retired by means of development impact fees. A rate of residential growth that differs substantially with the assumed debt retirement schedule would pose serious fiscal problems for the service entity. These problems would be heightened in the case of a development that does not have the benefit of Federal New Communities subsidies. According to representatives of the developer,¹⁰² the proposed development will not seek Federal New Community funds.

III. Findings/Recommendations

In summary, therefore, not only are there at this time environmental constraints of so serious a nature as to preclude most forms of the development, but also the commercial, industrial and residential market conditions in the Livermore-Amador Valley at this time make the proposed development premature and not conducive to the development of a new community consistent with regional and national policies.

This does not mean that there are not areas in the region today which may be appropriate for new communities. On the contrary, new towns which infill the urbanized lands of the East and West Bay have greater potential for both market feasibility and consistency with ABAG's policies.

As to the proposed development, staff would suggest for consideration by appropriate public entities, the entering into negotiations with the sponsor of the proposed development with an eye toward the purchase of the developer's options and land banking of the site for release at a future date when environmental conditions are no longer constraints on development and market conditions are more opportune for policy implementation.

FOOTNOTES

1. Livermore Air Pollution Study Report for 1973, Livermore Air Pollution Study Committee, August 1974.
2. Air Quality Report: Joint Freeway-Mass Transit Corridor Project on Interstate 580 and State Route 238 in Alameda County, California Division of Highways (CALTRANS).
 - a. Attachment B - March 1972
 - b. Supplemental Summary of Findings - May 1973
 - c. Second Supplement - April 1974
 - d. Summary of Findings Relative to Air Quality - May 1974
3. Population Growth and Air Quality in the Livermore-Amador Valley, Arthur D. Little, Inc., p. 58, July 1974.
4. An Evaluation of Improved Accessibility to the Livermore Valley and Its Effects on Population Growth and Air Quality - Preliminary Staff Report, Metropolitan Transportation Commission, October 31, 1974.
5. Analysis of Environmental Factors: Las Positas New Town General Plan Amendment, Wilsey and Ham, February 1974.
6. BAAPCD. Personal communication. James Sandberg, Chief, Meteorology Department, BAAPCD.
7. Air Pollution and the SF Bay Area, BAAPCD, January 1975. Figures on p. 39 and personal communication.
8. An estimate of the amount of air pollution in the Livermore Valley in 1990 which will be attributable to the Las Positas project can be made by comparing the predicted amount of pollutant emissions due to Las Positas-related activities with the predicted total Valley emissions. If the assumption is made that all emissions are proportional to automobile usage, referred to as vehicle miles travelled (VMT), then this amount is:

<u>VMT due to project:</u> ⁵	<u>650,000</u>	=19%
VMT in Valley 1990: ²	3,400,000	

Using the currently accepted EPA method of proportional rollback and the Larsen frequency curve (op. cit. California Division of Highways, 4/74, p. 62), ABAG staff finds that if the oxidant standard is exceeded 6 times/year in the Livermore Valley, a 19% reduction in total emissions will result in the standard being exceeded 2 times/year. However, if we make the more realistic assumption that one-half of the total emissions are generated by sources other than vehicles in the Valley (see following paragraph), then a 19% VMT reduction will result in a reduction of 19%/2, or 9.5%, of total emissions. This reduction would have a lesser effect, causing the frequency of violations to decrease from 6 to 4 times a year, a 33% improvement.

Concerning the percentage of the Valley air pollution due to vehicular emissions within the Valley, The Livermore Air Pollution Study Report for 1973 (p. 2) estimates that approximately 50% of the emissions in the Valley were imported in 1968. This figure is now assumed to be approximately 25% due to the higher relative growth in the Valley since that year. (Ft. 3, p. 54) Also, MTC (Ft. 4) estimates that approximately 55% of the total Valley emissions will be from mobile sources. (Table 6) Therefore, the percentage of total Valley emissions generated by vehicles within the Valley is estimated to be 55% of the 75% locally generated emissions. (41%) With the limits of reliability of the above figures, this figure can be approximated as $\frac{1}{2}$.

9. Communication with Vincent Wong, Alameda County Flood Control and Water Conservation District, Zone 7.
10. Environmental Impact Report on the Proposed Sphere of Influence for the City of Livermore Final, Volume I, Alameda County Local Agency Formation Commission, February 1975.
11. Vincent Wong, op. cit.
12. Ibid.
13. Interim Population Projections of Alameda County Planning Commission, October 7, 1974.
14. Environmental Impact Report on North Livermore Area Plan Amendment Consideration, Alameda County Planning Department, 1974.
15. Tentative Water Quality Control Plan Report: San Francisco Bay Basin (2). State Water Resources Control Board, Regional Water Quality Control Board, November 1974, pp. 15-67 to 15-70.
16. Ibid.
17. Communication with George Musso, Director of Planning, City of Livermore, California, March 17, 1975.
18. State Division of Water Quality, Eligibility Capacities for Funding of LAVWMA Facilities. Conversation with George Billingsley, March 18, 1975.
19. Water Resources Investigation 37-73, United States Geological Survey.
20. Policy Resolution of September 19, 1973, Alameda County Flood Control and Water Conservation District, Zone 7.
21. According to Livermore Public Works Director Daniel Lee, annexation to Livermore (which would require approval of LAFCO but not that of the State PUC) would be required as a condition of receiving water from the City.
22. Preliminary Geologic Map of the Mount Diablo-Byron Area, Contra Costa, Alameda, and San Joaquin Counties, California, Brabb, Earl E., Howard S. Sonneman, and John R. Switzer, Jr., 1971. U. S. Geological Survey and HUD San Francisco Bay Region Environment and Resources Planning Study, Basic Data Contribution #28, 2 map sheets, 1971.

23. Helley, E. J., K. R. Lajoie and D. B. Burke, 1972. "Geologic Map of late Cenozoic Deposits, Alameda County, California," U. S. Geological Survey and HUD San Francisco Bay Region Environment and Resources Planning Study, Basic Data Contribution #48, 1 map sheet.
24. Nilsen, Tor H., 1971. "Preliminary Photointerpretation Map of Landslide and Other Surficial Deposits of the Mount Diablo area, Contra Costa and Alameda Counties, California," U.S. Geological Survey and HUD San Francisco Bay Region Environment and Resources Planning Study, Basic Data Contribution #31, 1 map sheet.
25. Radbruch, Dorothy H. and Louise M. Weiler, 1963. Preliminary Report on Landslides in a Part of the Orinda Formation, Contra Costa County, California, U. S. Geological Survey Open-file report, 35 pp.
26. Bruer, Wesley G. (State Geologist), December 1973, "State of California Index to Maps of Special Studies Zones," California Division of Mines and Geology, 1 map sheet.
27. Faults that are Historically Active or that Show Evidence of Geologically Young Surface Displacement, San Francisco Bay Region; A Progress Report, Brown, Robert D., Jr., U.S. Geological Survey and HUD San Francisco Bay Region Environment and Resources Planning Study, Basic Data Contribution #7, 2 map sheets, October 1970.
28. Analysis of Environmental Factors, Wilsey and Ham, op.cit., pp. 2-21.
29. Environmental Impact Report on the Proposed Sphere of Influence. op.cit., p. 36.
30. Conversation with George Musso, Director of Planning, City of Livermore, California, March 17, 1975.
31. Ibid.
32. Analysis of Environmental Factors, Wilsey and Ham, op.cit.
33. "The Costs of Sprawl," Real Estate Research Corporation for the Council on Environmental Quality, the Department of Housing and Urban Development, Environmental Protection Agency, 1974. "Municipal Sewage Treatment: A Comparison of Alternatives," Batelle Memorial Institute, Columbus, Ohio, for Council on Environmental Quality, February 1974.
34. For selected major service costs.
35. Alameda County Local Agency Formation Commission, decision of February 27, 1975.
36. Resolution No. 768, California Regional Water Quality Control Board.
37. Policy Resolution of August 21, 1974, Livermore-Amador Valley Water Management Agency.

38. Vol. II, Responses to Draft Environmental Impact Report, North Livermore Area Plan Amendment Consideration, Alameda County Planning Department, October 15, 1974.
39. Local Government Cost-Revenue Bibliography, The Association of Bay Area Governments, June 1974.
40. Environmental Impact on the Proposed Sphere of Influence for the City of Livermore, op.cit., pp. 21 and 22.
41. 1973 Management Report, Booz, Allen and Hamilton.
42. Environmental Impact Report on the Proposed Sphere of Influence, op.cit., p. 24.
43. Report on a Potential Sphere of Influence for the Livermore Area Park and Recreation District, Alameda County Local Agency Formation Commission, December 1974.
44. Livermore Area Park and Recreation District Policy Statement on the Proposed Alameda County General Plan Amendment for the Las Positas New Town, July 24, 1974.
45. Environmental Impact Report on the Proposed Sphere of Influence, op.cit., p. 23.
46. Vol. II, Responses to Draft Environmental Impact Report for the North Livermore Area Plan Amendment Consideration, op.cit..
47. Conversation with R. F. D'Ambra, Administrative Assistant - Operations Division, Livermore Valley Joint Unified School District, March 14, 1975.
48. Las Positas New Town: Proposed Amendment to Alameda County General Plan, Wilsey & Ham, December, 1973, p. 42.
49. Environmental Impact on the Proposed Sphere of Influence, op.cit., p. 23.
50. Alameda County Implementation Strategies for General Hospital Acute Inpatient Services - 1975, December 12, 1974.
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54. Statistical estimates of Joint Commission on Mental Health of Children.
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56. Alameda County Health Care Services: Mental Health Services, March, 1974, op.cit.

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62. Priorities on Annexation and Special District Formations, Policy No. 1-3, Alameda County Local Agency Formation Commission.
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64. Environmental Impact Report for the Proposed Sphere of Influence, Final, Vol. I, pp. 51-52.
65. Ibid., p. 52.
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68. Ibid., Table 5-5.
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71. Ibid., p. i.
72. Ibid., p. 38.
73. Ibid., p. 36.
74. Ibid., p. 39.
75. Ibid., p. 37.
76. Ibid., p. i.
77. Ibid., p. ii.
78. Ibid., p. iii.

79. Ibid.
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91. Ibid.
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93. Based on projected resident labor force of 15,200, Wilsey and Ham. op.cit., pp. 5-23.
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95. Conversation with Kip Cady, MTC Staff, March 1975.
96. "Route Inventory Report," California Department of Transportation, August 1973.
97. Analysis of Environmental Factors, op.cit., Wilsey and Ham, pp. 5-29.

98. "Call-A-Ride System," Columbia Association, Columbia, Maryland,
"Dial-A-Ride System," Santa Clara County Transit Authority, Santa
Clara County, California.
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100. Analysis of Environmental Factors, Wilsey & Ham, op. cit., p. 8-6.
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Association of Bay Area Governments, September 1971.
102. Ronald T. Calhoun, Wilsey and Ham, Foster City, California, before ABAG
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